

**APPARENT VIOLATION\***

**REGULATORY CONFERENCE**

**ENTERGY, INC.**

**JULY 10, 2003**

***\*NOTE: THE APPARENT VIOLATION DISCUSSED AT THIS REGULATORY CONFERENCE IS SUBJECT TO FURTHER REVIEW AND MAY BE REVISED PRIOR TO ANY RESULTING ENFORCEMENT ACTION.***

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## APPARENT VIOLATION

10 CFR 50.48, "Fire protection," Section (b) states,

*"Appendix R to this part establishes fire protection features required to satisfy Criterion 3 of Appendix A to this part with respect to certain generic issues for nuclear power plants licensed to operate before January 1, 1979. ... With respect to all other fire protection features covered by Appendix R, all nuclear power plants licensed to operate before January 1, 1979, must satisfy the applicable requirements of Appendix R to this part, including specifically the requirements of Sections III.G, III.J, and III.O."*

10 CFR Part 50, Appendix R, Paragraphs III.G.2 and III.G.3 state,

2. *Except as provided for in paragraph G.3 of this section, where cables or equipment, including associated non-safety circuits that could prevent operation or cause maloperation due to hot shorts, open circuits, or shorts to ground, of redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment, one of the following means of ensuring that one of the redundant trains is free of fire damage shall be provided:*
  - a. *Separation of cables and equipment and associated non-safety circuits of redundant trains by a fire barrier having a 3-hour rating. Structural steel forming a part of or supporting such fire barriers shall be protected to provide fire resistance equivalent to that required of the barrier;*
  - b. *Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustible or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area; or*
  - c. *Enclosure of cable and equipment and associated non-safety circuits of one redundant train in a fire barrier having a 1-hour rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area;*
3. *Alternative or dedicated shutdown capability and its associated circuits, independent of cables, systems or components in the area, room or zone under consideration, shall be provided:*
  - a. *Where the protection of systems whose function is required for hot shutdown does not satisfy the requirement of paragraph G.2 of this section; or ..."*

Contrary to this requirement, in Fire Areas 98J and 99M in Arkansas Nuclear One, Unit 1, the licensee failed to ensure that cables of redundant trains of systems necessary to achieve and maintain hot shutdown conditions were free of fire damage by one of the means specified in 10 CFR Part 50, Appendix R, Paragraph III.G.2, or by alternative means specified in 10 CFR Part 50, Appendix R, Paragraph III.G.3.

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