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PER100

03/01/02

Workorder: 02-000550-000

Status: 1

£ntry Date: 01/18/2002 15:24 Planner/Supv: JOHN THOMAS

Requested By: BRENDA F. SIMRIL 843-8515

***** SUPERVISOR *****

PER Level Rev Level 00

Identified By LINE ORGANIZATION

Self Revealing Y

Problem Description As part of the extent of condition for PER 00-007928-000, the following issue has been identified. While verifying specified Appendix R manual actions and timelines associated with mitigation of spurious operation of valves 1,2-FCV-63-072 & -073, it has been determined that all technical issues were not considered. Specifically, manual actions specified for closure of valve 1,2-FCV-63-001 did not alert the operator to the potential for requiring local manual operation of the valve. Additionally, emergency lights have not been provided for local operation. Follow up walkdowns have been performed and accessibility of

1.2-FCV-63-1 has been confirmed.

Plt Process Equip Y
Potential Oper Issue Y
Potential Reportable Y
Potential Degrad/Noncon(91-18) Y

ASME N
Systems Affected N/A
Systems Affected
Systems Affected
Systems Affected
Units Affected
Units Affected 1&2
Recommendation Process PER
No action, Justify
If Process,PER Level D
If Utilize ACP, No
Immed Action Taken Performed walkdowns of 1,2-FCV-63-1, -2 to determine

accessability for manual operation.

Provided guidance to operations to revise AOP-N.01 to respond to spurious operation of 1,2 FCV-063-072, -73 by manually closing 1,2-FCV-74-3, -21 as appropriate.

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Specified appropriate equipment to ensure manual actions can be completed within required time frame.

Contacted operations to re-evaluate minimum operator staffing requirements for responding to an Appendix R fire.

Revised AOP-N.01 to allow manual closure of FCV-63-1 for areas where RHR valves are inaccessable.

Recommended Resp Org ENG/MECH
Coordinated With John Thomas
Init Sup-First Last John Thomas
Init Sup Phone 8224
Init Department ENG/MECH
Init Sup Review Date 01/18/2002

***** LEVEL D INFORMATION ****

Lvl D Causing Org
Lvl D Causing Crew
Human Perf Proc Code
Apparent Cause
Lvl D Process/Proced
Hardware Disposition
Technical Justify
Init Supv-First Last
Init Supv Phone
Init Sup Review Date

***** OPS *****

Functional Eval (FE) Y
FE Due Date 01/22/2002
Affect Operability
If Yes,Units/Actions
Offsite OP Review Y
Op Review BFN N

Op Review BLN N

Op Review SQN N

Op Review WBN Y

Reportable Y

If Yes, List Basis It was determined that sufficient lighting did not exist to provide for local, manual operation of FCV-63-1 on Unit 1 or Unit 2. This condition was reported in accordance with License Condition 2.H for Unit 1 and 2 operating license to the Region II Director.

Ops SRO/STA-Fst Last Toney Whitten Ops SRO/STA Rev Date 01/18/2002

Functional Maint N Potential Degrad/Noncon(91-18) Y

FE/Eval Due Date

Initial Evaluation A review of the condition identified revealed that this condition is in non-compliance with SQN's current licensing basis for maintaining Appendix R lighting and is therefore, reportable.

91-18 Degrad Nonconf Y

Functional/Eval Basis Actions associated with FOR 3.7.14.a taken to provide alternate lighting.

> AOP-N.01 revised via the 50.59 process, therefore, functional evaluation not required per SPP3.1.

Immed/Comp Measures Y

List Action/Measures Notified NRC of condition within required 24 hours.

Revised procedure AOP-N.01 to manually/locally close 1,2-FCV-74-3 and -21 to mitigate the spurious opening of 1,2-FCV-63-72, -73 and subsequent draining of RWST into containment.

Provided tooling to assist operator in manually closing isolation valves.

Issued standing order to require use of hand held lighting when manually closing 1,2-FCV-3, and -21 to mitigate an Appendix R fire.

Engineer John Thomas Date 02/11/2002 Supervisor John Thomas Date 02/11/2002 **OPS SRO/STA-Fst Last OPS SRO/STA Rev Date**

** MRC *****

Process PER Level C Interim Action Reg'd N If YES, Specify RCA Required N Site Qual Conc/Ver N

signed Resp Org ENG/MECH
A Develop Due Date 02/20/2002
RC Directions
RC CAP Review N
RC-First Last John Hamilton
RC Review Date 01/22/2002

***** Resp Org *****

A Develop Due Date 02/20/2002 ection ENG/MECH OC-First Last Brenda Simril OC Phone 8515 eactivity Mgt Issue N /B-LER N ER No. ontrol of NonConfor N Yes, Scope

risposition RIM/EDMS
Iffsite Generic Rev Y

ardware Disposition

ieneric Rev BFN

ieneric Rev BLN

Seneric Rev Corp

Seneric Rev SQN

Beneric Rev WBN Y

'rocess/Procedures

***** CAUSE DATA *****

apparent Cause Engineering failed to identify design requirements for qualified lighting to perform manual actions to mitigate a fire in accordance with Appendix R.

Root Cause

Causing Org ENG/ELECT

Causing Crew

Juman Perf Proc Code

1P Perf Second Code

²rev/Similar Event N/A

Specify Search Basis

Extent of Condition

***** PER HUMAN PERF *****
***** PER CA/RC ITEMS *****

1 Action Item Issue design change documentation to rewire the control circuit for FCV-63-72 and -73 such that spurious operation of the valves from an Appendix R fire will not occur.

1 Action Type CORRECTIVE ACTION

- 1 Assigned Org ENG/ELECT
- 1 CA Due Date 03/30/2002
- 1 AO Concur-Fst Last
- 1 AO POC Fst Last RON GLADNEY
- 1 CA Performed
- 1 Date Completed
- 2 Action Item Verify implementation of DCN for Unit 1
- 2 Action Type CORRECTIVE ACTION
- 2 Assigned Org ENG/MECH
- 2 CA Due Date 05/30/2003
- 2 AO Concur-Fst Last JOHN THOMAS
- 2 AO POC-Fst Last BRENDA SIMRIL
- 2 CA Performed
- 2 Date Completed
- 3 Action Item Verify implementation of DCN for unit 2
- 3 Action Type CORRECTIVE ACTION
- 3 Assigned Org ENG/MECH
- 3 CA Due Date 05/30/2002
- 3 AO Concur-Fst Last JOHN THOMAS
- 3 AO POC Fst Last BRENDA SIMRIL
- 3 CA Performed
- 3 Date Completed

****** CLOSURE COMMENTS FROM CA ***** CAP CONCUR *****

PER Completion Date 05/30/2003

Prep-First Last John Thomas

Preparer Date 02/20/2002

Telephone No 8224

- (C) Supv-First Last John Thomas
- (C) Supv Ext 8224
- (C) Supv Date 02/20/2002
- (B) DptMgr-Frst Last
- (B) DptMgr Date MRC Regd N

MRC Concurrence

Reason for N

MRC-First Last

- **MRC Date**
- (A) SiteSr-Fst Last
- (A) SiteSr Date
- (A) PltMgr-Fst Lst (A) PltMgr Date

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03/01/02

teact Eng-Fst Lst
teact Eng Date
tite Qual Conc Reqd. N
tite Qual Concur
teason for N
tite Qual First Last
tite Qual Date

***** VERIFICATION *****

inal Rev Level
ags Rem-First Last
ags Date
30 Verify Comp
30 Verify Date
NI/ANII Required N
NI/ANII Concurrence
Reason for N
NI/ANII Date
Site Qual Concur
Reason for N
Site Qual First Last
Site Qual Date
30 Supv Clos-Fst Lst

Closure Date

***** EXTENSIONS ******

***** GENERIC REVIEWS *****

BFN Resp Org
BFN Due Date
BFN Gen Rev Results
BFN Review-Fst Lst
BFN Review Date
BLN Resp Org
BLN Due Date
BLN Gen Rev Results
BLN Review-Fst Lst
BLN Review Date
CORP Resp Org

CORP Due Date CORP Gen Rev Result **CORP Review-Fst Lst**

CORP Review Date

SQN Resp Org

SQN Due Date

SQN Gen Rev Results

SQN Review-Fst Lst

SQN Review Date

WBN Resp Org ENG/MECH

WBN Due Date 02/13/2002

WBN Gen Rev Results Copy to CR Allen 02/13/02 for information only review.

WBN Review-Fst Lst TERESA WILSON

WBN Review Date 02/13/2002

***** OPERABILITY REVIEWS **

BFN Notified-Fst Lst

BFN Notified Date

BFN Op Rev Results

BFN Review-Fst Lst

BFN Review Date

SQN Notified-Fst Lst

SQN Notified Date

SQN Op Rev Results

SQN Review-Fst Lst SQN Review Date^{*}

WBN Notified-Fst Lst DUNCAN BENNETT

WBN Notified Date 01/25/2002

WBN Op Rev Results A review of WBN AOI-30.2 did not identify any local ...

manual actions taken at the valve for 1-FCV-63-1.

Therefor this PER is not applicable to WBN.

WBN Review-Fst Lst DUNCAN BENNETT

WBN Review Date 01/25/2002

***** TRENDS *****

Program Code FP

Program Code

Program Code

INPO Code FP1

INPO Code

NRC Code

NRC Code

Category PROCESS

Short Term Code

Impact 4.0

Behavior Code

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rg / Prog Code EMS ther AUSE CODES

Total records selected:

*** END OF REPORT ***

| TVAN | SQN Fire Hazards Analysis Calculation | SQN-26-D054/ |
|------|---------------------------------------|----------------|
| | | EPM-ABB-IMPFHA |

APPENDIX A.1

| Fire Area | Valve with Spurious Possibility | Required Manual Action |
|-----------|---------------------------------|--------------------------------------------------------------------------------------------|
| FAA-098 | 1-FCV-063-073 | Locally Close 1-FCV-74-21 |
| FAA-099 | 1-FCV-063-072 & 1-FCV-063-073 | Locally Close 1-FCV-74-3 and MCR Close 1-FCV-74-21 and then |
| | | pull fuses/open breaker for valve |
| FAA-100 | 1-FCV-063-072 & 1-FCV-063-073 | Locally Close 1-FCV-74-3, MCR Close 1-FCV-74-21 and then pull fuses/open breaker for valve |
| FAA-102 | 2-FCV-063-072 | 2-FCV-74-3 Close from the MCR and then pull fuses/open breaker for valve |
| FAA-103 | 2-FCV-063-072 | 2-FCV-74-3 Close from the MCR and then pull fuses/open breaker for valve |
| FAA-107 | 2-FCV-063-072 & 2-FCV-063-073 | Locally Close 2-FCV-74-3 and -21 |
| FAA-108 | 2-FCV-063-072 | Locally Close 2-FCV-74-3 |

In each of the fire areas listed above, in addition to the specifically identified actions, in order to prevent further spurious valve actuations, the breakers should be opened at the MCC for the following valves:

FCV-063-072 FCV-063-073 FCV-072-020 FCV-072-023

For fires in FAA-94, -95, -107, or -108 (Rx MOV Board Rooms) breakers for the MOVs may be inaccessible. Therefore, the Rx MOV Boards may be de-energized from the 480V Shutdown Boards.

| TVAN | SQN Fire Hazards Analysis Calculation | SQN-26-D054/ |
|------|---------------------------------------|----------------|
| | | EPM-ABB-IMPFHA |

APPENDIX A.1

Appendix A.1.(e) Spurious Opening of RCS Sump Suction Valves 63-72 & 63-73 in AB

NOTE: The compliance strategies and manual actions specified in this Appendix are required until implementation of DCNs D-21152 (U1) and D-1153 (U2)

For each of the Fire Areas Listed in the Table below there is a potential spurious opening of the Containment Sump Valves 1,2-FCV-63-072 or -073. For each of these fire areas the valves which could spuriously open and the mitigating action are listed. Additionally, for each of these areas the following generic local manual operator actions within 25 minutes are required:

| Fire Area | Valve with Spurious Possibility | | Possibility | Required Manual Action |
|---------------|---------------------------------|---|---------------|-----------------------------------------|
| FAA-001 | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-63-1 OR |
| | 2-FCV-063-072 | & | 2-FCV-063-073 | 1-FCV-74-3 and -21 |
| | | | | Locally Close 2-FCV-63-1 OR |
| | | | | 2-FCV-74-3 and -21 |
| FAA-013 | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-74-3 and -21 |
| FAA-026 | 2-FCV-063-072 | & | 2-FCV-063-073 | Locally Close 2-FCV-74-3 and -21 |
| FAA-029 A1-A6 | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-74-3 and -21 |
| | 2-FCV-063-073 | | | Locally Close 2-FCV-74-21 |
| FAA-029 A13- | 2-FCV-063-072 | , | • | Locally Close 2-FCV-74-3 |
| A15 | | | · | |
| FAA-044 | 2-FCV-063-072 | & | 2-FCV-063-073 | Locally Close 2-FCV-74-3 and -21 |
| FAA-054 - | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-74-3 and -21 |
| A2-A5 / Q-S & | 2-FCV-063-073 | | | Locally Close 2-FCV-74-21 |
| A5-A8 / Q-R | | | | |
| FAA-054 - | 2-FCV-063-072 | & | 2-FCV-063-073 | Locally Close 2-FCV-74-3 and -21 |
| A11-A14/Q-S | | | | |
| FAA-067 | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-74-3 and -21 |
| | 2-FCV-063-073 | | | Locally Close 2-FCV-74-21 |
| FAA-070 | 1-FCV-063-073 | | | Locally Close 1-FCV-74-21 |
| | 2-FCV-063-073 | | | Locally Close 2-FCV-74-21 |
| FAA-074 | 1-FCV-063-073 | | | 1-FCV-74-21 Close from the MCR and then |
| | | | | pull fuses/open breaker for valve |
| FAA-081 | 2-FCV-063-072 | & | 2-FCV-063-073 | Locally Close 2-FCV-74-3 and -21 |
| FAA-085 | 2-FCV-063-072 | & | 2-FCV-063-073 | Locally Close 2-FCV-74-3 and |
| | | | | MCR Close 2-FCV-74-21 and then |
| | } | | • | pull fuses/open breaker for valve |
| FAA-094 | 1-FCV-063-072 | & | 1-FCV-063-073 | Locally Close 1-FCV-74-3 |
| FAA-095 | 1-FCV-063-073 | | | Locally Close 1-FCV-74-21 |
| | 2-FCV-063-073 | • | | Locally Close 2-FCV-74-21 |