

Input to Browns Ferry Integrated IR 05000260,296/2003005

GENERAL INFORMATION

Site: Browns Ferry

Report No: 05000260,296/2003005

Dates: November 17-21, 2003

Inspectors:

Charlie Payne (Lead)
Senior Reactor Inspector

Date Signed

Branch Chief Concurrence:

Charles R. Ogle, Chief
Engineering Branch 1
Division of Reactor Safety

Date Signed

| IPs Used | Sample Size | Status (Open/Closed) |
|-----------|-------------|----------------------|
| 71111.05T | 0 | Open |
| | | |

| OFFICE | RII:DRS | RII:DRS | RII:DRS | | | |
|--------------|---------|------------|---------|--------|--------|--------|
| SIGNATURE | | | | | | |
| NAME | CPayne | KO'Donohue | COgle | | | |
| DATE | 12/ /03 | 12/ /03 | 12/ /03 | | | |
| E-MAIL COPY? | YES NO | YES NO | YES NO | YES NO | YES NO | YES NO |
| PUBLIC | YES NO | | | | | |

OFFICIAL RECORD COPY

DOCUMENT NAME: P:\IR 2003-05INPUT_BF_FP_URI Rev4.wpd

RK-4

REPORT INPUT

SUMMARY OF FINDINGS

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Mitigating Systems

- None

Report Details

4. OTHER ACTIVITIES

4A05 Other

(Closed) Unresolved Item (URI) 05000296/2003007-01: Inadequate Unit 3 Fire Procedure Directs Local Manual Operator Action Be Performed In Location of Fire

During the triennial fire protection inspection (NRC Inspection Report 05000260, 296/2003007, dated November 17, 2003), the inspectors identified a finding having potential safety significance greater than very low significance, involving procedural guidance in the Safe Shutdown Instruction (SSI) for Fire Area 13 (Unit 3 480 V RMOV Board Room 3A) that directed an operator to enter the location of the fire to perform a local manual action associated with tripping the Unit 3 Reactor Recirculation Pumps (RRPs). Specifically, Attachment 6, Steps 1.1 and 1.2 of 2/3-SSI-13 directed an operator to go to 250 V Reactor MOV Board 3A and place the control power breaker (breaker 1B1) for 4 KV Recirculation Pump Trip (RPT) Board 3-II to off. This action may not be successful for a severe fire in this room because of the high temperatures, heavy smoke, low visibility and hazardous plant conditions that would likely be encountered by the operator while the action is performed. This URI was opened pending further NRC review of the safety significance of the finding.

The inspectors reviewed licensee calculation ND-Q0999-92116, Appendix R Manual Action Requirements, Revision 17. This calculation required the RRP to be tripped during a severe fire in Fire Area 13 from 4 KV RPT Board 3-II. Additionally, to prevent potential RRP restart, control power to the RPT board was to be tripped. In general, RPT control power can be removed by individually opening breaker 1B1 on 250 V Reactor MOV Board 3A or by totally de-energizing this bus. Normal power to 250 V Reactor MOV Board 3A is provided from 250 V Battery Board 3 via breaker 203. 250 V Battery Board 3 is located in different fire area separate from Fire Area 13.

Recognizing that 250 V Reactor MOV Board 3A would be in the location of the fire, Appendix B, Section Fire Zone/Area 13, of the calculation identified that RPT control power should be removed by opening breaker 203 in Battery Board Room 3 (to totally de-energize 250 V Reactor MOV Board 3A.) This requirement was captured in Attachment 1, Step 1.4.1 of procedure 2/3-SSI-13. Consequently, the operator action at issue in this URI was redundant and not needed to successfully remove RPT control

power. The licensee initiated a procedure change request (PCR 20031551) to correct this procedure error.

After reviewing plant operating procedures, operator training and conducting operator interviews, the inspectors found that several other well known (skill-of-the-craft) methods were available to the operators for ensuring that the RRP's would be tripped during a severe fire in Fire Area 13. The inspectors concluded that the erroneous procedure guidance specified in Attachment 6 of 2/3-SSI-13 would have minimal impact on the operators' ability to safely shutdown the Unit 3 reactor. Because this issue has minimal safety significance and has been documented in the licensee's corrective action program (PER 03-013882-000), this issue should not have been considered a finding and is instead determined to be minor. URI 05000296/2003007-01 is closed.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

T. Golden, Operations
P. Heck, Site Licensing Engineer
J. Wallace, Site Licensing Engineer

NRC

B. Holbrook, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

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|---------------------|-----|--|
| 05000296/2003007-01 | URI | Inadequate Unit 3 Fire Procedure Directs Local Manual Operator Action Be Performed In Location of Fire. (Section 4A05) |
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COVER LETTER PARAGRAPH

None

PARTIAL LIST OF DOCUMENTS REVIEWED

Procedures

2/3-SSI-13, Unit 3 480 V RMOV Board Room 3A, Rev. 5

Calculations

ND-Q0999-920116, Appendix R Manual Action Requirements, Rev. 17

Procedure Change Requests (PCR) Initiated

PCR 20031551, Delete duplicate action to open RPT Control Power breaker on 250V RMOV Board 3A, dated 11/18/03