

Caswell (11)

NRC Triennial Fire Protection Review

Potential Issues

1. MOD No. 91-134, SRV Backup Actuation Via Pressure Transmitter Signals; - Non safety backup circuit to open All 11 SRVs was developed and installed approximately 1991-1992.
 - Fire in FA 2104 could damage 2 instrument cables & spuriously open All 11 SRVs. This vulnerability was added by the MOD.
2. Operator action to open links in 2 Control Rm. Back cabinets, to prevent spurious opening of All 11 SRVs (LARGE LOCA).
 - Action MAY NOT BE Completed in time to prevent spurious opening of SRVs.
 - Also, Emergency Lighting NOT Adequate, Labeling & Tools Poor.
 - Fire Brigade Actions under ideal conditions (based on Drill Data is about 23 to 24 minutes before the fire is controlled).
3. Operator Action to Open 2E11-F015A, Inboard LPCI Injection Valve, is NOT Reasonably Doable Due to Personnel Safety Concerns.
 - Operator must stand on small Area of Pipe Lagging (~ 4 inch x 12inch), ~ 6' to 7' ft. above floor, and reach back to operate 3 foot handwheel.
 - Also: Area is HOT, HIGH RAD, & CONTAMINATED (Full Anti-C's REQ'D); & EMERG Lighting Inadequate.
4. Operator Action to De-Energize Control BLDG. Ventilation Exhaust Fans is NOT Reasonably Doable Due to Personnel Safety Concerns. (CB., EL. 180 foot)
 - NO Emergency Lighting for Access, Egress, or to Perform Actions.
5. Emergency Lighting NOT Adequate for many Fire Procedure Operator Actions. (Several identified) *Approximately 15 action steps*
6. Many Operator Actions are relied upon for SSD, for a Fire in III.G.2. Areas, instead of physical protection for cables, without NRC approval. (Several identified)
7. Communication Systems NOT Analyzed. *for Hot SSD actions.*
8. Many Operator Actions, to Open or Close Links, may be considered 'REPAIRS' (Per SER) & therefore outside of Licensing Basis for HOT S/D during a Fire.
9. Labeling poor for Operator Actions involving opening or closing Links.
10. SSA & Fire Procedure allow a fire in FA 2104 to Spuriously Activate ADS. This may be contrary to licensing basis.
11. Fire Procedure Step 9.3.8 Directs Operators to Monitor RHR HX Flow Locally. However, there is NO Local Indicator.

(1) Information to Ken Sullivan to demonstrate that CS is capable of mitigating all 11 SRVs going open

(2) Licensee needs to demonstrate that process parameters remains within bounds for lots of minimal AC Power per Appendix 'R'. *KLK-20*

Apologize should not have been describe in OSHA cover