

Qoris

Transient Combustible Materials in Containment & Turbine Building Without Administrative Controls

NRC Identified

10 CFR 50.48

Introduction: The inspectors identified an NCV of 10 CFR 50.48 having very low safety significance (Green) when transient combustibles were stored in the Unit 1 Containment Building and the Turbine Building without required administrative controls.

Description: Inspectors identified that significant quantities of transient combustible materials were stored in the Unit 1 Containment and the Turbine Building during refueling outage 1R28 without required administrative controls. The materials in the Containment Building included 11 drums of lubricating oil and storage shelves full of radiation protection materials (cloth and plastic contamination control clothing and supplies). The inspectors also identified 8 drums of waste oil in the Turbine Building adjacent to Auxiliary Feedwater Pump and Emergency Diesel Generator areas. Permits did not exist for the storage of these materials as required by procedures NP 1.9.6, "Plant Cleanliness and Storage," NP 1.9.9, "Transient Combustible Control," and the Fire Protection Evaluation Report.

Analysis: The inspectors determined that failing to implement administrative controls for transient combustible materials in areas containing safety-related equipment was a performance deficiency warranting a significance evaluation. The inspectors concluded that the finding was more than minor in accordance with IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Disposition Screening," issued on January 14, 2004. The finding affected the Reactor Safety Initiating Events cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown, specifically protection against external factors (fire). The finding also affected the cross-cutting area of Human Performance because the licensee failed to identify the transient combustible materials during tours required by the Fire Protection Evaluation Report and procedures.

The inspectors attempted to complete a significance determination of this issue using IMC 0609, "Significance Determination Process (SDP)," dated March 21, 2003, Appendix F, "Fire Protection and Post-Fire Safe Shutdown SDP," and Appendix G, "Shutdown Operations." The issue was not suitable for analysis using the SDP process because Appendix F does not include analysis of shutdown conditions and Appendix G does not include analysis of fire protection measures. The inspectors determined that the finding was considered to be of very low safety significance (Green) because the quantity of transient combustibles was within the loading bounded by the analysis contained in the Fire Hazards Analysis Report. This finding was assigned to the reactor safety initiating events cornerstone for Unit 1.

Enforcement: 10 CFR 50.48 requires that the fire protection plan include administrative controls for fire prevention. The Fire Protection Evaluation Report requires that administrative controls be maintained for use of transient combustible material. Contrary to these requirements, significant quantities of transient combustible materials were found in areas of the Unit 1 Containment Building and the Turbine Building without required administrative controls. Because this violation was of very low safety significance and it was entered into the licensee's corrective action program, this violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy. (NCV 05000266/2004003-XX).

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Transient Combustibles in Turbine Building

To Be Combined with RCP Oil/Transient Combustibles in Containment 8

Not labeled or accounted for in accordance with housekeeping procedure.

Not part of transient combustible procedure requirements. (????)

NRC ID'ed