



July 5, 2007

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10 CFR 50.73

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Licensee Event Report 266/301-2007-002-00
Non-Compliant Manual Actions Performed
For Safe Shutdown Fire Zones

Enclosed is Licensee Event Report (LER) 266/301-2007-002-00 for the Point Beach Nuclear Plant, Units 1 and 2. This LER discusses the discovery of non-compliant manual actions for safe shutdown fire zones. This event is reportable in accordance with 10 CFR 50.73(a)(2)(ii)(B) as a, "Degraded or Unanalyzed Condition."

This letter contains no new commitments and no revisions to existing commitments.


Dennis L. Koehl
Site Vice-President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0066), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)

Point Beach Nuclear Plant Unit 1

DOCKET NUMBER (2)

05000266

PAGE (3)

1 of 4

TITLE (4)

Non-Compliant Manual Actions Performed in Response to Appendix R Fires

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
05	09	2007	2007	-- 002 --	00	07	05	2007	Pt Beach Unit 2	05000301	
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11)								
1			20.2201(b)			20.2203(a)(3)(ii)			<input checked="" type="checkbox"/>	50.73(a)(2)(ii)(B)	50.73(a)(2)(ix)(A)
POWER LEVEL (10)			20.2201(d)			20.2203(a)(4)				50.73(a)(2)(iii)	50.73(a)(2)(x)
100			20.2203(a)(1)			50.36(c)(1)(i)(A)				50.73(a)(2)(iv)(A)	73.71(a)(4)
			20.2203(a)(2)(i)			50.36(c)(1)(ii)(A)				50.73(a)(2)(v)(A)	73.71(a)(5)
			20.2203(a)(2)(ii)			50.36(c)(2)				50.73(a)(2)(v)(B)	OTHER Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iii)			50.46(a)(3)(ii)				50.73(a)(2)(v)(C)	
			20.2203(a)(2)(iv)			50.73(a)(2)(i)(A)				50.73(a)(2)(v)(D)	
			20.2203(a)(2)(v)			50.73(a)(2)(i)(B)				50.73(a)(2)(vii)	
			20.2203(a)(2)(vi)			50.73(a)(2)(i)(C)				50.73(a)(2)(viii)(A)	
			20.2203(a)(3)(i)			50.73(a)(2)(ii)(A)				50.73(a)(2)(viii)(B)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Felicia Hennessy, Programs Engineering Supervisor

TELEPHONE NUMBER (Include Area Code)

920/755-6461

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).

NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT

From May 9 through May 17, 2007, Point Beach Nuclear Plant (PBNP) identified non-compliant, procedurally specified manual operator actions used to achieve and maintain hot safe shutdown. These manual actions do not meet the expectations set forth in Regulatory Issue Summary (RIS) 2006-10, "Regulatory Expectations with Appendix R Paragraph III.G.2 Operator Manual Actions." The discovery was as a result of the National Fire Protection Association Standard 805 (NFPA 805) transition project review of manual actions associated with PBNP's Appendix R Safe Shutdown assessment. The review concluded that some of the manual actions performed in response to fires postulated for Appendix R Paragraph III.G.2 fire areas do not meet the criteria for allowable manual actions as specified in RIS 2006-10. These findings were documented in PBNP's corrective action process, compensatory measures were initiated and long-term resolution of the issue will be addressed as part of the NFPA 805 transition project.

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		2007	-- 002	-- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description:

With both Point Beach Nuclear Plant units operating in MODE 1 on May 9, 2007, it was determined that 284 manual operator actions employed to achieve and maintain hot safe shutdown were non-compliant with Appendix R Paragraph III.G.1 and III.G.2. This condition was discovered as part of the PBNP transition to NFPA 805. The purpose of NFPA 805 transition task SUP-1 was to document the compliance status of manual actions performed for Appendix R Paragraph III.G.1 and III.G.2 fire areas and fire zones against RIS 2006-10, "Regulatory Expectations with Appendix R Paragraph III.G.2 Operator Manual Actions." RIS 2006-10 provides the guidance used to assess manual actions for compliance with regulatory criteria. The identified manual actions were specified to be performed as a result of a fire in an Appendix R Paragraph III G.1 or III G.2 fire area. The manual actions do not meet the criteria specified in RIS 2006-10. The study identified 39 fire areas with non-compliant manual actions. Per RIS 2006-10, non-compliant manual actions are indicative of missing or degraded fire barriers. A detailed list of the specific fire areas is provided in the Additional Information section of this report. In the ENS notification for Event Number 43353, there was identified three non-compliant actions in Fire Area A11 and one non-compliant action in Fire Area A61. Further evaluation determined there were six non-compliant actions in Fire Area A11 and two non-compliant actions in Fire Area A61. These additional non-compliant actions were covered by compensatory actions currently in place.

Event Analysis:

As part of the NFPA 805 transition, a study of plant manual actions was conducted. Currently there are 995 actions specified in procedure FOP 1.2, "Potential Fire Affected Safe Shutdown Components." These actions were compared to criteria set forth in RIS 2006-10. Unless alternative or dedicated shutdown capability is provided or an exemption is granted from Paragraph III.G.2 of Appendix R, circuits which could cause maloperation or prevent operation of redundant trains for post-fire safe shutdown and are located in the same fire area must be protected in accordance with Paragraph III.G.2. The study concluded 284 manual actions did not meet these criteria.

Safety Significance:

Manual operator actions which are required to recover functionality of a system that is credited to achieve and maintain hot safe shutdown for a fire in a III.G.1 or III.G.2 fire area are indicative of a missing fire barrier. PBNP maintains administrative controls for the introduction of combustible materials and ignition sources to limit the probability of a fire. All areas are provided with fire protection features and most have fire detection and/or suppression systems. The operator manual actions, while non-compliant with the RIS 2006-10, remain proceduralized and provide assurance that hot safe shutdown can be achieved and maintained. Based on these administrative controls and fire protection features, the safety significance is considered to be low.

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Cause:

Prior to issuance of RIS 2006-10, "Regulatory Expectations With Appendix R Paragraph III.G.2 Operator Manual Actions," PBNP considered these types of manual actions acceptable. The RIS provided clarification of the regulatory expectations associated with the use of operator manual actions in III.G.1 and III.G.2 fire areas. Actions that were previously considered to be acceptable are now recognized to be non-compliant with Appendix R requirements.

Corrective Action:

The non-compliant manual actions have been documented in the PBNP corrective action program. Remediation of these conditions will be coincident with PBNP's intent to transition to the risk-informed, performance-based, fire protection approaches contained in NFPA 805.

As compensatory measures, hourly fire watches were implemented for the 39 fire areas of concern in accordance with PBNP procedure OM 3.27, "Control of Fire Protection & Appendix R Safe Shutdown Equipment."

The NFPA 805 transition team will either evaluate the non-compliant manual actions as acceptable due to detailed fire modeling and/or risk assessment or the non-compliant manual actions will be corrected via physical changes to the plant.

Previous Occurrences:

None

Additional Information:

The following table lists the fire area for which a fire may require use of non-compliant manual actions.

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# Manual Actions	Area Description	Fire Area
11	1B-32 MCC Area	A06
1	1P-2C CVCS Charging Pump Cubicle	A03
1	1P-2B CVCS Charging Pump Cubicle	A04
1	1P-2A CVCS Charging Pump Cubicle	A05
6	Chemical Drain, Laundry Tank and Reactor Coolant Pump Seal Filter Room	A07
5	HVAC Equipment Room & Pipeway No. 1 Valve Gallery	A08
5	Primary Auxiliary Building El. 44' & 66' (Except FX237)	A01-D
5	Unit 1 Facade	A01-G
5	Unit 2 Facade	A01-H
3	Radioactive Gas Treatment Area	A10
6	Pipeway No. 4 Valve Gallery	A11
1	2P2C CVCS Charging Pump Room	A12
1	2P2B CVCS Charging Pump Room	A13
1	2P2A CVCS Charging Pump Room	A14
12	2B32 Motor Control Center Area	A15
21	North Side of Auxiliary Feedwater Pump Room	A23N
19	South Side of Auxiliary Feedwater Pump Room	A23S
8	D06 Battery Room	A25
9	D05 Battery Room	A26
7	G01 Diesel Generator Room	A27
7	G02 Diesel Generator Room	A28
1	Air Compressor Room	A29
2	P206A & P207A Fuel Oil Pump Room	A61
7	Diesel Generator Building Train B Areas	A71
28	Primary Auxiliary Building El. 8' & Below	A01-A
18	Containment Spray/ Safety Injection Pump Room	A02
11	Primary Auxiliary Building El. 26' North Wing	A01-CN
10	Primary Auxiliary Building El. 26' South Wing	A01-CS
9	D106 Battery Room	A16
9	D04 Electrical Equipment Room	A17
9	D03 Electrical Equipment Room	A18
8	D105 Battery Room	A19
16	Turbine Building & South Service Building	A01-E
1	Yard Area	A01-F
1	D305 Swing Battery & D301 Charger Rooms	A54
5	Unit 1 Containment Area	A36
5	Unit 2 Containment Area	A46
7	Train B East Duct Bank & Manholes	A68
2	Train A West Duct Bank & Manholes	A70