

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SUBJECT: Responds to NRC 890321 ltr re violations noted in Insp Rept 50-263/89003. Corrective actions: operator energized panel.

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RIDS / ADDS



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April 19, 1989

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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to Notice of Violation
Inspection Report No. 50-263/89003(DRP)

In response to your letter of March 21, 1989, which transmitted Inspection Report No. 263/89003(DRP), the following information is offered.

Violation

Technical Specification 3.13.A, Fire Detection Instrumentation, states in part:

1. The minimum fire detection instrumentation for each fire detection zone.....shall be operable whenever equipment in that fire detection zone is required to be operable.
2. If Specification 3.13.A.1 cannot be met, within one hour establish a fire watch patrol to inspect the zone(s) with inoperable instruments at least once per hour.

Contrary to the above, the fire detection instrumentation system was inoperable from January 13 through 15 for a period of approximately 60 hours without fire watch patrols being established.

Explanation

The main control room fire detection system annunciator panel was inoperable for a period of approximately 60 hours. Local fire zone alarm panels were operable for the duration of the event. The Torus room is the only area of the plant requiring the main control room fire detection system annunciator panel to be operable to meet Appendix R separation requirements. Fire protection features provide defense in depth against fire in this area when remote detection is not available.

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These features include:

1. Fixed combustibles are essentially non-existent; consisting mainly of instruction pamphlets hung next to certain pieces of equipment. Transient combustibles are not allowed.
2. Fire ignition sources are minimal. All electrical components are within conduit or enclosures.
3. The local fire alarm for the torus room, which remained operable, was monitored by personnel entering the reactor building. This local fire alarm can be heard from the main access control airlock inside the reactor building. All site personnel are trained in the identification and reporting of fires. Review of records shows only one instance during the 60 hours in which someone did not pass through the airlock within time limits established by administrative controls for hourly fire watch patrols.
4. The redundant trains for safe shutdown equipment are horizontally separated by at least 100 feet with no intervening combustibles.

The control room annunciator panel was inoperable because it had been inadvertently de-energized. It is believed that this occurred during the installation of a modification involving this panel. The root cause of this event is inadequate work controls (ie. the modification procedure neither identified specific precautions to take to prevent unintentionally manipulating the annunciator panel power switch nor addressed the detection and correction of work errors which could result in disabling equipment located in the work area). A contributing cause is that the status of this panel was not routinely checked.

This event was reported to the NRC in Licensee Event Report 89-02 on February 14, 1989.

Corrective Action Taken and Results Achieved

1. The control room operators energized the panel and verified system operability. The fire detection system was therefore returned to an operational status the day of discovery (January 15, 1989).
2. Personnel involved in the preparation of the work procedure have been counseled on the proper considerations for controlling work activities around sensitive equipment.
3. The control room operating logs have been revised so that the status of control room fire annunciator panel is being checked hourly.

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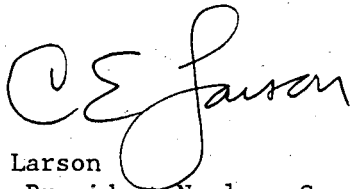
Corrective Action To Be Taken To Avoid Future Violations

1. The Licensee Event Report for this event will be presented to plant engineering personnel as part of the regular quarterly engineering staff training. This training will be completed by June 30, 1989.
2. A plant policy controlling work activities in areas containing sensitive equipment will be established and communicated to appropriate personnel. This will be done by December 31, 1989.
3. All systems important to safe operation of the plant will be evaluated for the risk of their being rendered inoperable due to an undetected loss of power. This evaluation will be completed by April 30, 1990.
4. Administrative controls will be revised to include, when performing modifications on the plant, consideration of the need for measures to prevent, and provide indication of, the failure of power supplies. These controls will be revised by December 31, 1989.

Date When Full Compliance Will Be Achieved

Full compliance was achieved on January 15, 1989 when power was restored to the main control room fire detection system annunciator panel.

Please contact us if you have any questions relating to our response to this violation.



C E Larson
Vice President Nuclear Generating

c: Regional Administrator-III, NRC
NRR Project Manager, NRC
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