

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-206/85-11, 50-361/85-11 and 50-362/85-10

Docket Nos. 50-206, 50-361, 50-362

License Nos. DPR-13, NPF-10, NPF-15

Licensee: Southern California Edison Company
P. O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Facility Name: San Onofre Units 1, 2 and 3

Inspection at: San Onofre Site, San Clemente, California

Inspection conducted: March 25-29, 1985

Inspector:

Phillip M. Qualls
P. M. Qualls, Reactor Inspector

April 15, 1985
Date Signed

Approved By:

T. Young Jr.
T. Young Jr., Chief, Engineering Section

April 15, 1985
Date Signed

P. H. Johnson
P. H. Johnson, Chief
Reactor Projects Section 3

4/16/85
Date Signed

Summary:

Inspection on March 25-29, 1985 (Report Nos. 50-206/85-11, 50-361/85-11 and 50-362/85-10)

Areas Inspected Unannounced inspection by a regional inspector of the implementation of the Fire Protection Program for San Onofre Units 1, 2 and 3. The inspection involved 35 hours onsite by one NRC inspector.

Results: Of the areas inspected no violations or deviations were identified.

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DETAILS

1. Persons Contacted

- *D. Peacor, Manager, Station Emergency Preparedness
- *K. Allen, Quality Assurance Engineer
- *P. Croy, Manager, Compliance
- *R. Krieger, Deputy Station Manager
- *D. Barreres, Supervising Engineer, Fire Protection
- *R. Tye, Supervisor, Fire Protection Services
- *J. McGaw, Licensing Engineer
- *P. King, Operations Quality Assurance Supervisor
- *P. Knapp, Manager, Health Physics
- *R. Richter, Fire Protection Engineer
- *R. Santosuosso, Assistant Maintenance Manager
- J. Pfefferle, Compliance Engineer
- *M. Speer, Compliance Engineer
- D. Cox, SCE Licensing

*Indicates those individuals attending the exit interview on March 29, 1985.

2. Documents Reviewed

- a. Fire Hazards Analysis
- b. SCE Letter to NRC dated March 19, 1984
- c. Fire Protection Order S0123-FP-1
- d. Fire Protection Procedure S0123-XIII-13
- e. Fire Protection Procedure S0123-XIII-12
- f. SCE Letter to NRC dated September 25, 1984
- g. SCE Letter to NRC dated October 26, 1984

3. Licensee Action on Previous Findings

A. Unit 1

Inspection Open Item 50-206/84-01-01 (CLOSED) Clogged Nozzles The licensee provided a report to the inspector documenting the corrective and follow-up actions for the clogged fire protection spray header in the containment. The actions are satisfactory. This item is closed.

No violations or deviations were identified.

B. Unit 2

- a. LER 82-007 (CLOSED) The licensee is installing both electrical and mechanical actuation devices which require a dual action to initiate the deluge system spray. This action appears sufficient to prevent future accidental spray initiations. This item is closed.

- b. LER 82-014 (CLOSED) and LER 83-142 (CLOSED) The licensee has an 18 month inspection of the area blanket fire wrap. All identified problems appear to be promptly corrected and, where required, the proper compensatory measures have been taken. These items are closed.
- c. Special Reports 01-18-X4, 05-21-X4, 07-19-X4, 09-21-83 and 11-15-83 (CLOSED) Inoperable Fire Doors The licensee has frequent walk through inspections to identify problems with fire doors. All discrepancies found appear to have been repaired in a timely manner. During an extensive tour of the unit the inspector found no inoperable fire doors. These items are closed.
- d. LER 83-140 (CLOSED) and Follow-up Item 50-361/84-01-01 (CLOSED) Fire Pump Shutoff The report provided to the inspector from the licensee appeared adequate and the corrective measures should prevent a recurrence. These items are closed.
- e. Inspection Open Item 83-35-03 (OPEN) FHA/FSAR Safe Shutdown List Differences The licensee explained to the inspector that the differences in the lists were due to the differences in the analysis assumptions, for example, the fire hazards analysis assumes no loss of offsite power. This item will remain open pending NRR review and response to the March 1984 exemption request submission from the licensee which requested that these assumptions be approved.

No violations or deviations were identified.

C. Unit 3

- a. LERs 83-30, 83-31, 83-33, 83-35 and 83-47 (CLOSED) The licensee is installing both the electrical and mechanical actuation devices which require a dual action to initiate the deluge system spray. This action appears sufficient to prevent future accidental spray initiations. These items are closed.
- b. Inspection Open Item 50-362/84-01-01 (CLOSED) RCP Shrouding Missing The shrouding has been replaced and licensee corrective actions appear adequate to assure that the event is not likely to recur.
- c. Inspection Open Item 50-362/84-01-02 (CLOSED) Fire Pump Shutoff The report provided to the inspector from the licensee appeared adequate and the corrective measures should prevent a recurrence. This item is closed.

No violations or deviations were identified.

4. Fire Department Training

The inspector observed the San Onofre Fire Department Training at the Poway, California Fire Department Training tower. The concrete structure

simulates a multi-story building and fires can be started on all of the levels. The training was conducted with fires in several locations in very dense smoke with the firemen making entry, putting out the fire and rescuing injured people while wearing breathing apparatus. The training was well planned and the firemen conducted themselves in a very professional manner.

No violations or deviations were identified.

5. Procedure Review

The inspector reviewed selected fire protection program and surveillance procedures for the units. The following potential weaknesses were discovered.

- a. The Control of Combustibles and Transient Fire Loads Procedure S0123-XIII-13, section 6.3.9 and 10 allows storage of transient combustible materials indoors, inside of the protected area, except in the cable spreading room, cable rise Gallery and Electrical Tunnel, if the quantity does not exceed 3 lbs per square foot of Class A combustibles. When a fire area such as the 63' penetration area is considered in Units 2 or 3, which contains some vital cables and has an area of 6400 square feet, then by procedure a person can store over 19,000 lbs of combustible material in this vital area without consulting the Fire Protection Organization. This event is unlikely due to the frequent patrols conducted by the licensee's fire watch organization. The licensee has committed to change the procedure to limit the amount of combustible materials stored in vital plant areas. This item will be examined at a later inspection (50-206/85-11-01, 50-361/85-11-01, 50-362/85-10-01) (OPEN).
- b. Plant procedures and Technical Specifications both state that the functional test for a fire damper is a visual inspection of the damper. NFPA Code 90 recommends that dampers be checked annually by removing the link and actually ensuring that the damper will close against air flow. The inspector identified this discrepancy to licensee personnel and pointed out that this problem has been identified and resolved at other operating plants. This discrepancy will be resolved at a later inspection (50-206/85-11-02, 50-361/85-11-02, 50-362/85-10-02) (OPEN).

No violations or deviations were identified.

6. Plant Tour

The inspector conducted an in-depth tour of all three units with the following results.

a. Hot Work

A jobsite was examined where "hot work" was in progress. The hot work permit was properly authorized and posted. The work was being done safely. The fire watch knew where all nearby communication systems were and what fire suppression equipment was nearby.

b. Housekeeping

In the Unit 3, 63' penetration area was stored about 6000 lbs of transient combustible materials. This did not violate procedure S0123-XIII-13 and did not exceed the amount of material that could be stored in the area by the analysis that was performed after the storage had already been put into the area. The procedural deficiency is identified in Paragraph 5.a.

c. Cereblanket

The one hour fire barrier wrap appears to be very easily damaged and the inspector noticed that it is starting to degrade. The licensee has a periodic inspection procedure to look for these deficiencies.

d. Fire Barriers

The inspector observed an unsealed penetration of a fire barrier in the Unit 2, 70' cable riser. It was later determined that the licensee had discovered this in his inspection and NCR G-558 had been issued to seal the barrier. The inspector observed no other fire barrier problems.

e. Fire Doors

The fire doors examined were all operable and in good condition. One unlabeled fire door was questioned but the licensee produced documentation showing its adequacy.

f. Fire Protection Equipment

Fire hoses, extinguishers and other equipment inside of the units were examined. The extinguishers were properly sealed and labeled and all of the equipment appeared to be well maintained.

No violations or deviations were identified.

7. Appendix R Discussion

On March 27 the inspector met with licensing personnel from SCE. The inspector received some background information concerning the March 19, 1984 submittal to NRR and made known his concerns about some potential problems with the submittal.

No violations or deviations were identified.

8. Exit Interview

An exit meeting was held with members of the plant staff on March 29, 1985. The items listed in this report were discussed at that time.