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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
SPECIAL REPORT REGARDING INOPERABLE FIRE BARRIER PENETRATION SEALS

Gentlemen:

The enclosed Special Report, submitted in accordance with Technical Specifications 3.14.7.2.c and 6.9.3.1.d, describes the inoperability of fire barrier penetration seals at H. B. Robinson Unit 2. These penetration seals were removed from service for inspection and repair, and were not be returned to an operable status within the seven day requirement of the Technical Specifications. These instances are described separately as follows.

On June 18, 1990, at 1430 hours, fire barrier penetration EP-2540.01-FL-07/05 was made inoperable to perform work required by a plant modification. This penetration passes through a thirty-two inch by ten foot blockout between the Reactor Auxiliary Building hallway and the Component Cooling Water Heat Exchanger room. The modification required that a conduit passing through the blockout be cut, capped, and abandoned in place. However, when preparing to cap the conduit, it was found to be loose. The modification was then revised to completely remove the conduit.



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During the subsequent removal effort, the blockout was discovered to be filled with brick, which was not an approved penetration seal material. The penetration consisted of a ragged hole, with voids in the internal brick-work, such that a grout repair was not feasible without further engineering evaluation. The seven day Technical Specification requirement was exceeded at 1430 hours on June 25, 1990. A repair method was developed and approved for the penetration, the repairs were completed, and the penetration was returned to service at 1800 hours on July 20, 1990. It should be noted that the existence of brick in this penetration is being addressed within a separate program which addresses the requirements of NRC Bulletin No. 80-11.

On June 26, 1990, a 100% inspection of the site fire barrier penetration seals was in progress. This inspection was being performed in accordance with OST-623, "Fire Barrier Penetration Seal Inspection," to satisfy the requirements of Technical Specification 4.14.5.1. As part of this inspection, piping penetrations MP-4108.02-FP, MP-4108.03-FP, and MP-4108.04-FP were inspected. These penetrations are in a blockout (CP 4108.00FB) between the Gas Stripper A and B room (Fire Zone 7) and the Pipe Alley (Fire Zone 11). This wall is 24 inches thick with grout-faced brick sealing up the blockout. The pipe passing through the penetration was insulated with asbestos.

During the inspection, it was discovered that voids were present in the foam above the piping penetrations. The penetrations were declared inoperable at 1550 hours on June 26, 1990. While repairing the penetrations, it was noticed that some of the foam removed had bad cell structure. Based on this discovery, it was decided that all foam should be removed and the seals should be completely refoamed. As work progressed, it was discovered that brick and insulation inside the blockout prevented the installation of the required twelve inches of foam seal. It was decided to remove an amount of material sufficient to allow a proper foam seal. During removal of this material, asbestos was discovered, which required that specially trained personnel and equipment be used for further removal of material. Ultimately, a 10 inch by 23 inch section of the blockout was cleaned out to a depth of at least 12 inches, and this area was regrouted in accordance with plant procedures. After the grout had cured, the penetrations were properly foamed and were returned to an operable status at 2200 hours on July 3, 1990, which exceeded the seven day requirement of the Technical Specifications.

A review of records associated with penetrations MP-4108.02-FP, MP-4108.03-FP, and MP-4108.04-FP indicates that these penetrations were repaired previously in 1985. Further review and investigation of this matter revealed that these penetrations have effectively been inoperable since this last repair. Since these penetrations were inoperable without implementing the compensatory actions required by the Technical Specifications, this occurrence will be reported in accordance with 10CFR50.73, taking into consideration the information provided within Licensee Event Report No. 90-010, dated July 20, 1990.

Should you have any questions regarding this report, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson Steam Electric Plant

CTB:lko

cc: Mr. S. D. Ebneter
Mr. L. W. Garner
INPO