NRC Form (9-83)	366								Ţ	•	U.S. NU	CLEAR REGUL	ATORY COMMISSION
				LICENSEE EVENT REPORT (LER)					EXPIRES: 8/31/88				
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FACILITY	NAME (1		. .								DOCKET NUMBER	(2)	
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During a routine internal audit of Fire Department records at Nine Mile Point Unit 2, it was discovered that Surveillance Requirements for Fire Rated Assemblies as defined by Technical Specifications had been exceeded on two separate occasions on November 12, 1986. At the time of the event Nine Mile Point Unit 2 was in its initial fuel load phase with the mode switch in the "REFUEL" position.													
	The first event was due to cognitive personnel error. It occurred when a Fire Watch Patrol failed to verify an hourly surveillance in the Control Complex Building by recording the date and time of the surveillance on the "Fire Watch Sign In Sheet" posted in the area. The fireman performing the patrol was doing so at shift change and was not familiar with the patrol route. The event duration was ?2 minutes.												
- -	The second event was also due to cognitive personnel error. A Fire Watch Patrol failed to maintain an hourly surveillance at the Steam Tunnel due to a mistake when updating a status board of inoperable fire rated assemblies. The event duration was 1 hour and 23 minutes.												
	The importance of maintaining hourly fire watch patrols has been reemphasized to Fire Department personnel and Fire Department Fire Watch Patrol methods are being revised to help eliminate such events from reoccurring in the future.												
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	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION				
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)		
		YEAR SEQUENTIAL SECUSION NUMBER			
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0		012 05 014		

I. DESCRIPTION OF EVENTS

During a routine audit of "Fire Watch Sign In Sheets" by the Fire Department Supervisor at Nine Mile Point Unit 2 it was discovered that the Surveillance Requirements for Fire Rated Assemblies as defined by Technical Specifications had been exceeded on two separate occasions on November 12, 1986. At the time of the violations Nine Mile Point Unit 2 was in its initial fuel load phase with the mode switch in the "REFUEL" position. The status of all structures, components and systems in the plant was normal. No plant system or component failures resulted from the event and no operator action was required.

Per plant Technical Specifications an hourly fire watch patrol is required in an area with one or more fire rated assemblies inoperable and with operable fire detectors on at least one side of the inoperable assembly(s). Half hourly fire watch patrols are established by Fire Department Supervision via in-place department policy. The Surveillance Requirements are verified by use of a "Fire Watch Sign In Sheet" which is posted in the area where surveillance is required. As Fire Department personnel perform a fire watch patrol they are required to record the date, time, and person performing surveillance on the "Fire Watch Sign In Sheet" as they proceed through the area.

II. CAUSE OF EVENTS

The first event occurred at 0007 hours when the one hour time limit from the previous surveillance expired. The Niagara Mohàwk Fireman performing the fire watch patrol in the Control Complex Building failed to verify his surveillance on the "Fire Watch Sign In Sheet" posted in the area near an inoperable fire rated assembly (number C1303). The cause of the event was determined to be a cognitive error by the person performing the fire watch patrol. The fireman performing the specific fire watch patrol was doing so for the first time that shift and was not familiar with the locations of all the "Fire Watch Sign In Sheets". It has been verified by further audit that the remaining "Fire Watch Sign In Sheets" along this particular patrol were maintained properly by the fireman performing the same area and signed in on the "Fire Watch Sign In Sheet" as required, thus ending the event. The total duration of the Technical Specification violation was 22 minutes.

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	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION					
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)			
		YEAR SEQUENTIAL REVISION				
Nine Mile Point Unit 2	0 5 0 0 0 4 1 0	8 6 - 0 0 6 - 0 1	0 3 OF 0 4			

The second event occurred when the Fire Department failed to maintain an hourly Fire Watch Patrol at the Steam Tunnel while a fire rated assembly in this area (number 2NX036N17) was inoperable. Investigation has shown the cause to be improper updating of the fire penetration Breach Status Board which is used as a visual aid for establishing and maintaining Fire Watch Patrols in areas with inoperable fire rated assemblies. As fire rated assemblies are declared operable and no longer require hourly surveillance they are removed from the Status Board and the sign in sheets are removed from the field while fire rated assemblies that are declared inoperable are added to the status board and sign in sheets are posted in the field. In an attempt to update the status board after several fire rated assemblies were declared operable, a Niagara Mohawk fireman erased the board and rewrote all of the inoperable assemblies on it except one, which he forgot. At the next shift change the sign in sheets in the plant were pulled down and replacements posted as dictated by the status board. This was a normal function of the Fire Department and resulted in the removal of the posted sign in sheet at the inoperable fire rated assembly with no replacement being posted. However, an hourly fire patrol was maintained through the area by two other sign in sheets located in the same general area as the inoperable fire rated assembly. At 1500 hours, the sign in sheet closest to the unposted penetration was cleared and removed, and thus it cannot be established that the patrol for the unposted inoperable penetration was maintained despite the lack of a sign in sheet. At 1600 hours the next hourly surveillance was due and missed. At 1723 hours that same day it was discovered that the mistake had been made and a sign in sheet was posted and a Fire Watch Patrol established. The total duration of the event was one hour and 23 minutes.

III. ANALYSIS OF EVENTS

Although the Fire Watch Patrol Surveillance Requirements as defined by plant Technical Specifications were exceeded on two separate occasions on November 12, 1986, the Fire Detection Systems for both areas involved were operable for the duration of events. If the detection systems had at any time become inoperable while there was an inoperable fire rated assembly in the area then a continuous Fire Watch would have been established in accordance with plant Technical Specifications. Therefore there were no safety consequences as a result of these events. The elapsed times were 22 minutes for the first event and 1 hour 23 minutes for the second event.

IV. CORRECTIVE ACTION TAKEN

All Fire Department personnel receive training in Plant Technical Specifications Requirements and the importance of proper performance of the duties related to these requirements. The requirements and policies pertinent to the events which occurred at Nine Mile Point Unit 2 on November 12, 1986 have been re-emphasized to all Fire Department personnel by their supervisors. Fire Department personnel have also been notified that failure to observe these requirements may result in disciplinary action against the persons involved. Fire Department Fire Watch Patrol methods are also being revised to help eliminate such events from reoccurring in the future.

NRC FORM 366A

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V. ADDITIONAL INFORMATION

This event was not the result of component failure but rather cognitive personnel error. No previous similar events have occurred at Nine Mile Point Unit 2.

Identification of Components Referred to in this LER

Component	IEEE 803 EIIS Funct	IEEE 805 System ID
Fire Rated Assembly	PEN	FA
Fire Detection	N/A	IC
Fire Detector	28	IC

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