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AUTH.NAME / DEAN,R.J.	AUTHOR ÁFFILIATION Niagara Mohawk Powe	Ver Corp.	• .	¥	
CONWAY, J.T. RECIP.NAME	. Niagara Mohawk Powe RECIPIENT AFFILIA	er Corp. FION			

SUBJECT: LER 98-019-00:on 980617, determined that fire proofing was missing from beam.Caused by failure of contractor personnel. Breach permit initiated & compensatory fire patrols were established.W/980717 ltr.

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Niagara Mohawk

John T. Conway Vice President Nuclear Generation

Office: (315) 349-4213 Fax: (315) 349-2605

> July 17, 1998 NMP2L 1808

United States Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

RE: Docket No. 50-410 LER 98-19

Gentlemen:

In accordance with 10CFR50.73(a)(2)(ii), we are submitting LER 98-19, "Fire Proofing Missing from Beam."

Very truly yours,

1.Con

John T. Conway Vice President - Nuclear Generation

JTC/GJG/kap . Attachment

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 Mr. H. J. Miller, Regional Administrator, Region I Mr. B. S. Norris, Senior Resident Inspector Records Management

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Nine Mile Point Nuclear Station, P.O. Box 63, Lycoming, New York 13093

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NRC FORM	(366		1	U.S. N	UCLEAR REGI	LATOR	Y COMMI	ISSION			APPROVED OMB NO. 3150-0104 EXPIRES:							
LICENSEE EVENT REPORT (LER) LICENSEE EVENT REPORT (LER) REQUEST: RECORDS COMMISSI (1500100)						EXTINCES: STIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION EQUEST: 50.0 HRS, FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE ECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY OMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT 0150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503							DLLECTION O THE LATORY PROJECT					
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							LICENSE	E CONT	ACT FOR T	1051	LER (12)							
NAME											TELEPHONE NUMBER							
R. J. Dean, Engineering Manager - NMP2							(315) 349-4240											
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																		
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ABSTRACT (Limit to 1400 spaces, Le., approximately fifteen single space typewritten lines) (10)

On June 17, 1998, Nine Mile Point Unit 2 (NMP2) personnel determined that a structural beam in the Division II Emergency Switchgear Room was not properly coated with fire proofing. Heightened awareness as a result of structural fire proofing deficiencies identified at Nine Mile Point Unit 1 (NMP1) prompted the identification of the deficiency discussed in this report. A historical review determined that the fire proofing was removed to attach conduits to the beam during the original construction of NMP2.

The cause of the missing fire proofing is the failure of the contractor personnel to assure that the beam was re-fire proofed after the conduits were installed during construction. The cause of not discovering the missing fire proofing during subsequent inspections is inadequate managerial methods due to weaknesses in the fire proofing inspection program.

A breach permit was initiated and compensatory fire patrols were established. The beam was re-fire proofed and additional inspections have been performed. No additional significant missing/damaged fire proofing was identified. Fire department personnel have been made aware of the importance of detecting missing fire proofing coatings. Drawings and procedures will be revised to assure that future routine inspections would detect similar deficiencies.

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NRC FORM 366A	APPROVED OMB NO. 3150-0104 EXPIRES:									
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION			ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 2053, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.							
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Nine Mile Point Unit 2	05000410		98	-	19	-	00	02	OF	04

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

I. <u>DESCRIPTION OF EVENT</u>

On June 17, 1998, NMP2 personnel determined that a beam in the Division II Emergency Switchgear Room was not properly coated with fire proofing. Heightened awareness as a result of structural fire proofing deficiencies identified at Nine Mile Point Unit 1 (NMP1) prompted the identification of the deficiency discussed in this report. These deficiencies at NMP1 were previously reported in NMP1 LER 98-09, "Missing Fire Proofing Material from Structural Steel."

A historical review was performed to determine when and how the fire proofing was removed. From this review, engineers determined that it is likely that the fire proofing was removed in the 1985 to 1987 timeframe when conduits were being installed during the original construction of NMP2. At that time, fire proofing was installed on the beam and was likely removed to support conduit attachment. However, the contractor installing the conduits failed to reinstall the fire proofing.

Since 1990, fire department procedures have required inspection of structural steel fire proofing for Appendix R fire barriers. That procedure has sketches from design drawings as attachments which are annotated as to which walls, ceilings and floors are safe shutdown barriers. The procedure contains direction on inspection of fire proofing and acceptance criteria. However, the primary focus of the procedure is on penetration inspections and barrier integrity. Prior to 1990, on-the-job training was provided for penetration inspections and barrier integrity inspections. However, in July 1990, inspection of structural steel with fire proof coating for Appendix R barriers was added to the procedure but training was not provided.

II. CAUSE OF EVENT

The cause of the missing fire proofing is the failure of the contractor personnel to assure that the beam was re-fire proofed after conduits were attached to the beam. The contractual documents indicate that the construction company was to re-fire proof the beam after the conduits were installed. The construction company personnel failed to verify that the as left condition of the beam met the design requirements.

The cause of not discovering the deviation during subsequent inspections was inadequate management methods due to weaknesses in the fire proofing inspection program. The procedure used to inspect penetrations seals and barrier integrity was revised to include fire proofing on structural steel in 1990. The procedure is weak with regard to specific direction as to what to inspect and certain figures attached to the procedure were based upon engineering drawings which were inadequate in that certain safe shutdown barriers were not identified. In addition, the inspectors were not adequately trained on the procedure revision.

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III. ANALYSIS OF EVENT

This event is reportable in accordance with 10CFR50.73(a)(2)(ii), "Any event or condition that resulted in the condition of the nuclear power plant, including its principal safety barriers, being seriously degraded, or that resulted in the nuclear power plant being: (B) In a condition that was outside the design basis of the plant."

The affected structural steel beam is located in the ceiling of the Division II Emergency Switchgear Room. This beam supports the floor of the Relay Room located above it. The fire hazards in this room consist of cables and cable trays, insulation and a motor-control center. The fire load of this room translates to a Fire Severity of one hour and forty seven minutes resulting in room temperatures of approximately 1800°F.

This room is protected with a total flooding CO_2 fire suppression system, full smoke detection coverage and portable fire extinguishers. Additionally, CO_2 hose reels and water fire hose reels are located directly outside the room entrances in the north and south corridors of the control building. This equipment provides adequate coverage for manual fire fighting.

With the fire suppression and detection in the Division II Emergency Switchgear Room, a fire in this area would not likely result in a failure of this beam. The fire effects would be mitigated by automatic and manual suppression capabilities. This room is subjected to routine daily fire door checks and operator rounds along with security checks of the exterior doors. If a fire were to originate in the room, it is likely that the fire would be detected in a short period of time. In the unlikely event these automatic and manual defense-in-depth fire protection features were not available and the fire brigade did not respond to a fire in this area, the structural integrity of the affected steel beam could have been compromised. Given these conditions, it could have resulted in a condition outside the Appendix R Safe Shutdown Analysis and impacted the safe shutdown capability of the plant from the control room. However, the Division I Remote Shutdown Panel would have been available to assist in safely shutting down the plant.

IV. CORRECTIVE ACTIONS

- 1. A breach permit was initiated and compensatory fire patrols established until the fire proofing was repaired.
- 2. The fire proofing was restored to original design requirements.
- 3. All safe shutdown barriers at NMP2 have been inspected and no additional significant missing/damaged fire proofing has been detected.

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IV.	CORRECTIVE A	CTIONS (Cont'd)	Ŧ									
4.	The remaining drawings which define safe shutdown barriers have been reviewed. Some discrepancies in the drawings were identified. Followup plant inspections were performed and no additional fire proofing discrepancies were found.											
5.	The NMP2 drawings which were found to be deficient, and the NMP2 inspection procedure, will be revised and training provided to fire department personnel prior to the next inspection of fire barriers at NMP2.											
6 .	Fire department pe documents (e.g., d	rsonnel will be trained on the rawings) prior to the next ins	NMP1	l proce of fire	dure bai	e and asso rriers at N	ciat MP	ed engine 1.	ering	i		
7.	. Since 1987, the administrative procedures and programs for modifications and maintenance have been significantly improved to incorporate appropriate controls and should preclude recurrence. Enhanced controls are in place to provide oversight of contractor personnel to ensure that requirements are met.											
v.	· ADDITIONAL INFORMATION											
A.	. Failed components: none											
в. [.]	Previous similar ev	ents: nonè										
C. Identification of components referred to in this LER:												

COMPONENT	EEE 803 FUNCTION	DIEEE 805 SYSTEM ID
Emergency Switchgear Room	N/A	NA
Relay Room	N/A	NA
Remote Shutdown Panels	PL	JD

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