

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9002060168      DOC.DATE: 90/01/29      NOTARIZED: NO      DOCKET #  
 FACIL:50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv      05000388  
 AUTH.NAME      AUTHOR AFFILIATION  
 DAVIS,S.E.      Pennsylvania Power & Light Co.  
 STANLEY,H.G.      Pennsylvania Power & Light Co.  
 RECIP.NAME      RECIPIENT AFFILIATION

SUBJECT: LER 89-016-00:on 891229,fire barrier surveillance not completed within Tech Spec 4.0.3.

W/8      ltr.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:LPDR 1 cy Transcripts.

05000388

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-2 LA THADANI,M	1 1 1 1	PD1-2 PD	1 1
INTERNAL:	ACRS MICHELSON	1 1	ACRS MOELLER	2 2
	ACRS WYLIE	1 1	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	DEDRO	1 1	NRR/DET/ECMB 9H	1 1
	NRR/DET/EMEB9H3	1 1	NRR/DET/ESGB 8D	1 1
	NRR/DLPQ/LHFB11	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB11	1 1	NRR/DREP/PRPB11	2 2
	NRR/DST/SELB 8D	1 1	NRR/DST/SICB 7E	1 1
	NRR/DST/SPLB8D1	1 1	NRR/DST/SRXB 8E	1 1
	<del>REG FILE 02</del>	1 1	RES/DSIR/EIB	1 1
	RGN1 FILE 01	1 1		
EXTERNAL:	EG&G WILLIAMS,S	4 4	L ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
	NSIC MAYS,G	1 1	NSIC MURPHY,G.A	1 1
	NUDOCS FULL TXT	1 1		
NOTES:		2 2		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED  
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 39 ENCL 39

A014





Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

January 29, 1990

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 89-016-00  
FILE R41-2  
PLAS - 406

Docket No. 50-388  
License No. NPF-22

Attached is Licensee Event Report 89-016-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that an operation prohibited by the Technical Specifications existed when a surveillance requirement was not completed within the allowances of Technical Specification 4.0.2.

H. G. Stanley  
Superintendent of Plant - Susquehanna

SED/mjm

Attachment

cc: Mr. W. T. Russell  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. G. S. Barber  
Sr. Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 35  
Berwick, PA 18603-0035

9002060168 900129  
PDR ADOCK 05000368  
S FLC

TE22  
11

LICENSEE EVENT REPORT (LER)

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 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) <b>Susquehanna Steam Electric Station - Unit 2</b>		DOCKET NUMBER (2) <b>0 5 0 0 0 3 1 8 8</b>	PAGE (3) <b>1 OF 0 3</b>
---	--	---	-----------------------------

TITLE (4)  
**Fire Barrier Surveillance Not Completed Within Technical Specification 4.0.3.**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)														
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)												
1	2	2	9	8	9	8	9	0	1	6	0	0	0	1	2	9	9	0	0	5	0	0	0

OPERATING MODE (8) <b>1</b>	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																						
POWER LEVEL (10) <b>1 0 0</b>	20.402(b)	20.406(a)(1)(i)	20.406(a)(1)(ii)	20.406(a)(1)(iii)	20.406(a)(1)(iv)	20.406(a)(1)(v)	20.406(b)	50.38(c)(1)	50.38(c)(2)	50.73(a)(2)(i)	50.73(a)(2)(ii)	50.73(a)(2)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vi)	50.73(a)(2)(vii)	50.73(a)(2)(viii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(ix)	73.71(b)	73.71(c)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)	

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER
NAME <b>S.E. Davis - Site Fire Protection Engineer</b>	AREA CODE <b>7 1 1 7</b>	<b>5 1 4 1 2 1 - 1 3 1 9 1 1 5</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (18)

On December 29, 1989 with Unit 2 operating in Condition 1 at 100% power, it was identified that the unit had operated in a condition prohibited by the Technical Specifications in that surveillance requirement 4.7.7.1 requiring an 18 month inspection of fire barriers (penetration seal portion) had not been completed within the allowances of Technical Specification 4.0.2. The surveillance had been started and was subsequently stopped on July 25, 1989 to allow a major revision to the surveillance procedure. The revision was completed but resulted in the surveillance being restarted without ample time to address an expanded sampling prior to the violation date. The initial sample resulted in four (4) type "A" seals being found inoperable. Compensatory actions were taken and an additional 10% sample of type "A" seals were chosen for inspection. The additional sample was not inspected prior to the violation date for the surveillance (December 27, 1989). The cause of this event was determined to be procedural error. Administrative procedure AD-QA-906 included a section which was determined to be in conflict with Technical Specification 4.0:2. This error was not recognized until December 29, 1989 at which time the 24 hour allowance for performing a missed surveillance per Technical Specification 4.0.3 was entered. When personnel determined that the surveillance could not be completed within the 24 hours, all type "A" seals in the Unit 2 Reactor Building which had not been inspected were declared inoperable and compensatory firewatches were established within one hour. The additional 10% sample of type "A" seals was successfully completed on January 8, 1990. Administrative procedure AD-QA-906 has been revised to delete the incorrect section.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0   5   0   0   0   3   8   8	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   9	-   0   1   6	-   0   0	0   2	OF	0   3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

EVENT DESCRIPTION

On December 29, 1989 with Unit 2 operating in Condition 1 at 100% power, it was identified that the Technical Specification 3/4.7.7 required 18 month inspection of fire barriers (penetration seal portion) had not been completed within the allowances of Technical Specification 4.0.2. The surveillance had been started initially on July 19, 1989 and was subsequently stopped on July 25, 1989. This was to allow revision of the surveillance procedures to provide more specific inspection criteria and the establishment of an enhanced and more detailed database to be able to perform the inspection of 10% of each type of fire rated penetration seal. The surveillance was restarted on December 15, 1989 and the inspection of the initial sample was completed on December 27, 1989. The inspection of the initial sample resulted in four (4) type "A" seals being found inoperable. Firewatches were established for the four inoperable seals and an additional 10% sample of type "A" seals was chosen for inspection. This additional 10% sample of type "A" seals was not inspected prior to the violation date for the surveillance (December 27, 1989). Administrative procedure AD-QA-906 included a section which stated "...if additional sampling is required to show operability it is not required to be performed by the surveillance due date." This section was determined to be in conflict with Technical Specification 4.0.2 which requires completion of all requirements of the surveillance prior to the violation date. This error was not recognized until December 29, 1989 at which time the 24 hour allowance for performing a missed surveillance per Technical Specification 4.0.3 was entered. When personnel determined that the surveillance could not be completed within the 24 hours, all type "A" seals in the Unit 2 Reactor building which had not been inspected were declared inoperable and compensatory firewatches were established. The additional 10% sample of type "A" seals was successfully completed on January 8, 1990.

CAUSE OF EVENT

The event was caused by a procedural error in that administrative procedure AD-QA-906 contained an incorrect interpretation of Technical Specification requirements on completion of surveillances.

A contributing factor to this event was the initiation of a major revision to the surveillance procedure during the performance of the inspection. The initiation of this revision prompted the work group involved to place the inspection on hold until the revision was completed. This resulted in restarting the inspection without ample time to address expanded sampling prior to the violation date.

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a) (2) (i) (B) in that the failure to complete a required surveillance constituted an operation prohibited by the guidance of Generic Letter 87-09 as incorporated into SSES Unit 2 Technical Specification Basis for Technical Specification 4.0.3, which allows 24 hours to complete a missed surveillance prior to complying with the time requirements of the action statement of the Technical Specification. When it was determined that

**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-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)  Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0   5   0   0   0   3   8   8   8   9   -   0   1   6   -   0   0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
							0   3   OF   0   3

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

the surveillance could not be completed within the 24 hours, the action statement for Technical Specification 3.7.7 was complied with within one hour.

This event created no significant consequences to the health and safety of the public and/or plant personnel. Compensatory measures were established for the four (4) seals found inoperable on December 27, 1989. Although compensatory actions were not established for the remaining seals until December 29, 1989, hourly roving firewatches were already in place in a large majority of the affected fire zones for other reasons during this period of time. The safety impact of this event would not have been greater at any other plant operating condition.

In accordance with the guidance provided in NUREG 1022 supplement 1 items 14.1 and 14.10, the required submission date for this report was determined to be 01/29/90.

CORRECTIVE ACTIONS

Work authorizing documents were issued to repair the four (4) type "A" seals found inoperable and appropriate firewatches were assigned to these affected fire zones.

The administrative procedure (AD-QA-906) has been revised to delete the incorrect statement regarding inspection of additional samples prior to the required date.

The revised surveillance procedures and the new database are now in place. Future performances of this surveillance will be scheduled for implementation approximately two months prior to the surveillance due date. This will allow adequate time for additional inspections if required, to be completed prior to the violation date.

ADDITIONAL INFORMATION

Failed Components Identification: Not Applicable

Previous Similar Reported Events:

There have been no previous similar events documented relating to fire protection surveillances.