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 AUTH. NAME AUTHOR AFFILIATION
 LLOYD, H. Pennsylvania Power & Light Co.
 STANELY, H.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 93-002-00: on 930113, several fire doors failed six-month surveillance procedure acceptance criteria due to excessive gaps around doors. Caused by personnel error. Fire doors will be repaired. W/930211 ltr.

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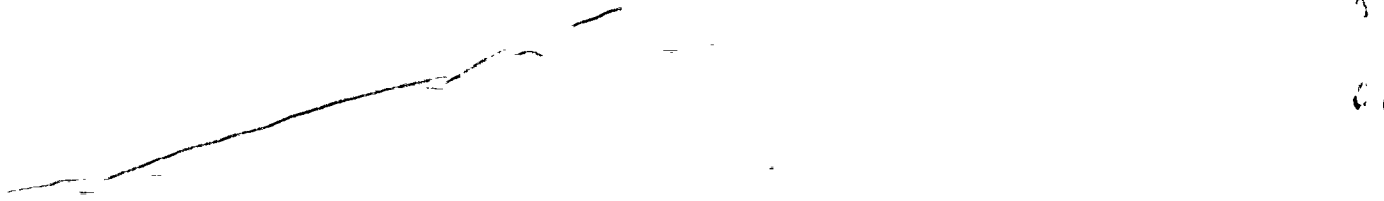
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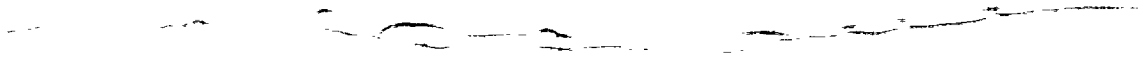
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February 11, 1993

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

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 93-002-00
FILE R41-2
PLAS - 558

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

Attached is Licensee Event Report 93-002-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that Susquehanna Unit 2 was in a condition prohibited by Technical Specifications when required LCO actions were not taken within the required time frame for inoperable fire doors.

H.G. Stanley

H.G. Stanley
Superintendent of Plant - Susquehanna

HL/mjm

cc: Mr. T. T. Martin
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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	PAGE (3) 1 OF 0 4
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TITLE (4)
Fire Doors Inoperable - Operation Prohibited by Technical Specifications

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)
0	1	3	9	3	0	0	2	0	SSES - Unit 1		0 5 0 0 0 3 8 7
0	1	3	9	3	0	0	2	1			0 5 0 0 0

OPERATING MODE (9) 1

POWER LEVEL (10) 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §; (Check one or more of the following) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.406(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.406(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Harrison Lloyd Jr. - Power Production Engineer	TELEPHONE NUMBER		
	AREA CODE 7 1 7	5 4 2 - 3 9 1 7	

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On January 13, 1993, with Unit 2 in Condition 1, several fire doors failed the six-month surveillance procedure acceptance criteria due to excessive gaps around doors. It was determined that the timeliness in reporting these failures was not within the required time and that the gap deficiencies had existed for some time. In addition, four Technical Specification fire doors were not included in the daily and six-month surveillance procedures and thus were not surveilled. Appropriate LCO action statements were entered and compensatory fire watches were established. The causes of this event were personnel error, procedural inadequacy, and drawing discrepancies. This condition was determined to be reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications in that required LCO action was not taken within the allowed time frame for inoperable Technical Specification components and Technical Specification surveillances were not performed. The subject fire doors will be repaired. The six-month surveillance procedures have been revised to more clearly specify acceptance criteria as well as to more clearly identify notification requirements when inoperable fire doors are discovered. This revision also included adding the fire doors to the procedure which were not included during this procedure performance. The daily surveillance procedures and the drawing which lists fire doors will be revised to include these doors also.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORD 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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Unit 2 Susquehanna Steam Electric Station	0 5 0 0 0 3 8 8	9 3	- 0 0 2	- 0 0	0 2	OF 0 4

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

DESCRIPTION OF EVENT

On January 13, 1993, with Unit 2 in Condition 1 at 100% power several fire doors failed the six-month surveillance acceptance criteria due to excessive gaps between the outer edge of the door and door frame and between doors that swing in pairs. Evaluation of this surveillance revealed that timely notification of the inoperable doors was not made to Shift Supervision within the required action time of the LCO action statement (notification was given on 1/14/93 rather than within one hour). Further evaluation concluded that the excessive gaps had existed without detection for a period greater than the six-month inspection interval. Upon notification of these conditions, the applicable Technical Specification action statement was entered and compensatory fire watches were established. Upon further review of the completed surveillance, it was noted that four Technical Specification fire doors (two per unit) were not included in the daily and six-month surveillance procedures and thus did not have the required surveillance performed. These doors comprise part of fire barrier enclosures which were previously declared inoperable so compensatory action was already in place.

CAUSE OF EVENT

The cause of the lack of timeliness in reporting this condition to the control room was personnel error. The procedure contained a precaution which directs those persons performing the surveillance to report to shift supervision immediately if a door is found to be inoperable but the precaution was overlooked during procedure performance. The failure to detect the existing excessive door gaps was caused by procedural inadequacy. The requirement to inspect door gap size did not exist until PP&L's specification on fire door inspections was issued in 1989. Technical Specifications do not specifically require gaps to be checked, but rather that the door closes and latches properly. Once the specification was issued, the surveillance procedures were revised to require the gap check. Some confusion in procedural interpretation can be attributed to the wording used in the procedure. Specifically, direction on gap criteria used the word "should" which could be interpreted to mean that as long as the door closed and latched properly, it could be considered operable. The cause of the failure to surveil four fire doors was that these doors were not identified in the surveillance procedure due to a drawing deficiency and therefore were not inspected. These doors were originally included in the scope of fire doors to be inspected. However, a drawing issued in

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

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

January, 1988 listing all required fire doors as defined by Appendix R studies did not include these doors. The doors were subsequently removed from the surveillance procedure by revision. Further study has concluded that these are, in fact, doors which should be considered Technical Specification doors since they make up part of the fire barrier for safety-related DC panels.

REPORTABILITY/ANALYSIS

This condition was determined to be reportable per 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the plant's Technical Specification for the following reasons:

- 1) The lack of timeliness in reporting this condition to the control room resulted in the required action time of the LCO action statement not being met.
- 2) PP&L concluded the excessive gaps have existed for a significant length of time (greater than the six month inspection interval) and therefore the required action time of the LCO action statement (firewatch established within one hour) was not met.
- 3) Failure to inspect the four Technical Specification fire doors resulted in failure to perform required surveillance testing within the required interval.

The safety consequences of excessive door gaps were negligible. The doors were declared inoperable and the appropriate compensatory actions were taken. The deficient gaps may have allowed fire doors to be prematurely forced open (depending on the amount of latch engagement) in the unlikely event of a fire, however, fire detection and/or suppression exists in the affected fire zones.

The failure to notify the control room of the deficient conditions did not increase the safety consequences for the same reason as stated above.

The failure to surveil fire doors could have increased the consequences prior to the declaration of inoperability of their enclosures. These doors are unique in that they are for panel access only and see little use.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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)		
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

This event would not have been more significant at any other initial operating condition.

In accordance with guidance provided in NUREG 1022, Supplement 1, item 14.10, the required submission date for this report was determined to be February 12, 1993.

CORRECTIVE ACTION

The subject fire doors will be repaired such that all gaps are within spec and all other aspects of door operability are maintained.

Applicable surveillance procedures have been revised to more clearly specify fire door acceptance criteria. This corrective action was in progress at the time of this event, as a result of LER 92-019-00 (Unit 1).

Concerning timeliness in reporting of door deficiencies, additional direction was provided for notification requirements other than just a precaution as discussed previously. Specifically, to notify the control room in a timely manner as soon as a discrepancy involving door operability is discovered. The six-month surveillance procedures have been revised to include these doors in the procedure. The daily surveillance procedures and the fire door drawings will be revised similarly.

ADDITIONAL INFORMATION

Failed Component Identification: N/A

Previous Similar Events:

Docket No. 50-387 LER 92-011-00, Fire Doors Inoperable; Operation Prohibited by Technical Specifications.

Docket No. 50-387 LER 92-019-00, Fire Door Inoperable; Operation Prohibited by Technical Specifications.