

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9808180131 DOC. DATE: 98/08/12 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 AUTH. NAME AUTHOR AFFILIATION
 ELLIS, S.J., Pennsylvania Power & Light Co.
 KUCZYNSKI, G.J. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-015-00: on 980714, continuous fire watch was not established per requirement of TS. Caused by reviewer failing to identify discrepancy at time due to conflict w/drawing. Continuous fire watch was established. W/980812 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

05000387G

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FULL TEXT. CONVERSION REQUIRED

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George J. Kuczynski
General Manager-Susquehanna

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August 12, 1998

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/98-015-00
PLA - 0004968 FILE R41-2

Docket No. 50-387
License No. NPF-14

Attached is Licensee Event Report 50-387/98-015-00. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) in that a continuous fire watch was not established as required by the Technical Specification. Upon identification of this discrepancy, a continuous fire watch was established.


G. J. Kuczynski
General Manager - Susquehanna SES

Attachment

cc: Mr. H. J. Miller,
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

cc: Mr. Kenneth M. Jenison
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

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12

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Susquehanna Steam Electric Station - Unit 1

DOCKET NUMBER (2)

05000387

PAGE (3)

1 OF 3

TITLE (4)

Continuous Fire Watch Not Established Per Requirement Of Technical Specification

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 NAME	DOCKET NUMBER
7	14	98	98	015	00	8	12	98	Susquehanna SES - Unit 2	05000388
									FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		2	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		000	20.2201(b)			20.2203(a)(2)(v)			X 50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Stephen J. Ellis - Senior Engineer, Licensing

TELEPHONE NUMBER (Include Area Code)

717 / 542-3537

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES
(If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On July 14, 1998, at 0830 hours, with Unit 1 in Condition 2 (Startup) at 0% power and Unit 2 in Condition 1 (Power Operation) at 100% power, it was determined that a one hour fire watch had been established instead of a continuous fire watch, as required by the ACTION of Technical Specification 3.7.7, when a fire wall penetration seal had been breached. The penetration seal had been released for work with the one hour fire watch established on June 29, 1998. A later review revealed that the wall containing the penetration seal was a Technical Specification fire barrier. Therefore, the penetration needs to be considered as Technical Specification related. An additional review identified two additional breached penetration seals, all in the same fire zone. When the Fire Protection System Status Change (FPSSC) Form was originally completed, the wall was not considered a Technical Specification fire barrier. During the work preparation process, the fire barrier's designation was changed. The FPSSC form was reviewed prior to release of the work. The reviewer failed to identify the discrepancy at that time due to a conflict on the reference drawing being used. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that the continuous fire watch requirement of the Technical Specification was not fulfilled in the time interval allowed. Corrective actions include: a continuous fire watch was established; drawing changes were made to remove the conflicting note; all existing fire protection impairments were reviewed; drawings were reviewed for similar conflicts; procedural guidance will be provided for completion of the FPSSC form; and training to be provided to the Site Fire Protection Engineer designees.



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

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Susquehanna Steam Electric Station - Unit 1	05000 387	98	-- 015	-- 00	2 OF 3

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

EVENT DESCRIPTION

On July 14, 1998, at 0830 hours, with Unit 1 in Condition 2 (Startup) at 0% power and Unit 2 in Condition 1 (Power Operation) at 100% power, it was determined that a one hour fire watch had been established instead of a continuous fire watch, as required by Technical Specification 3.7.7, when a wall penetration seal had been breached in a Technical Specification fire barrier. The penetration seal had been released for work (hourly fire watch in effect) on June 29, 1998. A later review revealed that the wall containing the penetration seal was a Technical Specification fire barrier. Therefore, the seal should have been identified as a Technical Specification required fire seal. Since there is no fire detection in that area, a continuous fire watch is required by ACTION a of Technical Specification 3.7.7. Further review identified that two other penetrations in the same fire zone were being worked, which also required a continuous fire watch (one continuous fire watch would have been adequate for the 3 penetrations).

CAUSE OF EVENT

A Fire Protection System Status Change (FPSSC) form was initiated for each penetration to be breached. At the time the FPSSC forms were initially prepared by the planner and reviewed by a Site Fire Protection Engineer (SFPE) designee, the penetrations were not considered subject to Technical Specification. A note had specifically been added to the drawing (C-1746) stating the penetrations were not Technical Specification related. Following the initial preparation of the forms, these penetrations were "upgraded" to Technical Specification related, although the note was inadvertently not removed. Prior to issuance of the work packages to the field, the FPSSC forms were again reviewed. The note on C-1746 indicated the penetrations were not subject to Technical Specification 3.7.7, and therefore, a one hour fire watch would be adequate. Drawing C-1746 had been revised to reflect the fire barrier as Technical Specification related, but the note provided conflicting information. The cause of the event has been determined to be that the relationship of the dampers and doors reclassification to the existing notes on the drawings had not been reconciled.

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that the continuous fire watch requirements of Technical Specification 3.7.7, ACTION a, was not fulfilled. There was no safety consequence as a result of having only a one hour fire watch, as opposed to a continuous fire watch, in that no fire occurred. The hourly fire watch, coupled with the fact that this is an accessible and frequently traveled area, implies that a fire would have been detected and reported in a timely manner. As such, the health and safety of the public was never compromised as a result of this event.

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

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Susquehanna Steam Electric Station - Unit 1	05000				3 OF 3
	387	98	-- 015	-- 00	

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

CORRECTIVE ACTIONS

The following corrective actions have been completed:

- A continuous fire watch in this fire zone was established.
- Drawing C-1746 was changed to remove the note with the conflicting information.
- All existing (working) Fire Protection impairments were reviewed to ensure no additional discrepancies existed, and none were found.
- Plant Scheduling SFPE designees were limited to processing FPSSCs only when clearly identified in plant procedure.
- Reviewed the walls re-classification effort and the related C-1700 series of drawings for similar conditions, and none were found.
- Direction was given that all FPSSC forms currently in the work process, will be reviewed, in light of the changes in Fire Protection, to current criteria before the release of the component for work.

The following corrective actions are scheduled for future completion:

- Provide procedural guidance for completion of FPSSC form.
- Provide training on program changes to SFPE designees.
- Develop and communicate source reference documents to be used in completing the FPSSC forms.
- Review the pending changes to the C-1700 series drawings and assure changes in technical accuracy are incorporated.
- Review with cognizant engineers, the need for timely and correct incorporation of changes.
- Provide a SFPE Designee Qualification Training Module.

ADDITIONAL INFORMATION

Past Similar Events: Docket No. 50-387 LER 98-013-00
50-387 LER 97-023-00

Failed Component: None