NAC	Form	306
(9-83	)	

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMS NO. 3150-0104

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SUPPLEMENTAL REPORT EXPECTED (14)

YES (II yes, complete EXPECTED SUBMISSION DATE)

Y NO

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EXPECTED SUBMISSION DATE (15)

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

On May 16, 1988, from 2150 to 2202 hours, a continuous fire watch was not maintained in the Cable Spreading Room [NF] as required by Plant Technical Specification (TS) 3.22.3. This TS requires the "establishment of a continuous fire watch with backup fire suppression equipment in the unprotected area(s) within one hour" if the sprinkler system [KP;SRNK] encompassing the area is not operable. The reactor was critical with the Plant operating at 100 percent of rated power at the time of the event.

Subsequent investigations revealed two other failures to meet fire watch responsibilities occurred. These events occurred on May 12, 1988 from 0056 to 0059 hours and May 16, 1988 from 1822 to 1829 hours. Each of the three occurrences were related to one security officer who failed to perform his duties. The occurrences have been attributed solely to poor performance of the involved individual.

It should be noted that neither the fire detection system nor sprinkler system were physically inoperable at any time the continuous fire watch was not maintained. However, it was felt that sprinkler dispersion patterns may be affected due to scaffolding and decking being installed in the Cable Spreading Room in support of asbestos removal. Continuous fire watches will be maintained in the Cable Spreading Room until the asbestos removal work is completed.

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NRC	Form	366A

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

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/85

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

#### Description

On May 16, 1988, from 2150 to 2202 hours, a continuous fire watch was not maintained in the Cable Spreading Room [NF] as required by Plant Technical Specification (TS) 3.22.3. This TS requires the "establishment of a continuous fire watch with backup fire suppression equipment in the unprotected area(s) within one hour" if the sprinkler system [KP;SRNK] encompassing the area is not operable. The reactor was critical with the Plant operating at 100 percent of rated power at the time of the event.

On May 11, 1988, a continuous fire watch with backup fire suppression equipment was established in the Cable Spreading Room of the Plant's Auxiliary Building. The fire watch was established due to the potential for scaffolding being erected to interfere with the design capabilities of the installed fire suppression sprinkler system. The scaffolding was being erected to support asbestos insulation removal being done in accordance with Consumers Power's Asbestos Abatement Program and the Occupational Safety and Health Act 29CFR1926.58. The scaffolding is designed to support a deck approximately nine feet off the floor. The deck area was enclosed, maintained at a negative pressure and compensatory fire watches were established. This configuration allows asbestos removal and cleanup work to be conducted within the deck enclosure without affecting normal operations below the deck.

On May 18, 1988, the Plant's security contractor received a report that a security officer assigned as the continuous fire watch was seen outside the area. This report was filed by another member of the security force. A subsequent investigation initiated by the Plant Property Protection Supervisor revealed that the officer in question was assigned the duty of a fire watch on eight occasions from May 11 to May 18, 1988. Of the eight occasions, records indicate the officer left his post three times. These times were:

May	12	0056	to	0059	hours
May	16	1822	to	1829	hours
Mav	16	2150	to	2202	hours

### Cause Of The Event

The officer in question was a recent hiree who successfully completed General Employee Training which includes fire protection responsibilities on, April 7,1988, and the Security Officer's Training Program, on April 15, 1988. The Security Officers Training Program includes Fire Protection Implementing Procedures (FPIP) 4, "Fire Protection Equipment" and FPIP 7, "Fire Prevention Activities". The officer in question was hired and trained with other officers.

Cardreader tapes, indicating entry and exit times for the Cable Spreading Room, were reviewed to assess fire watch performance of the five new

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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hirees. This review revealed that of the five new hirees, only the officer in question departed the area without relief from duty as continuous fire watch. A sample of records representing approximately 10 percent of the remaining security force assigned to fire watch duties from May 11 to May 18, 1988 were also reviewed to assess performance. All individuals performed fire watch duties as required.

As an additional measure to assure security officers were cognizant of their responsibilities as the dedicated fire watch in the Cable Spreading Room, the Plant's security contractor issued a memorandum detailing the reasons for and responsibilities of personnel providing a fire watch. This memorandum was read at security officer pre-shift briefings and posted in the Cable Spreading Room. These measures were implemented on May 11, 1988.

The officer in question did not return to the Plant from May 17 to May 26, 1988 and as a result, could not be immediately questioned regarding the incidents. During this period the officer's employment was terminated. However, on May 26, 1988, the officer returned to the Plant and was questioned about his deficient performance as fire watch in the Cable Spreading Room. The officer admitted to leaving his assigned area on two occasions to make personal telephone calls and that he had read the posted memorandum concerning fire watch responsibilities.

Based on the above, this incident is felt to be isolated, solely associated with the performance of the involved security officer.

# Corrective Actions

A review was conducted to determine if there was a generic weakness within security officer performance as dedicated watch. This review indicated the problem was isolated to the guard in question.

The use of security officers as dedicated fire watch in the Cable Spreading Room is expected to continue for the duration of the asbestos removal work. This work effort is expected to be complete by approximately August 1988.

### Analysis Of The Event

The failure of the security officer to remain in the assigned area as a dedicated fire watch is not felt to have posed a hazard to the public in that the fire detection equipment in the area was operable, the sprinkler system was physically operable, alternate fire suppression equipment was staged in the area and the guard was directly adjacent to the affected area while not at his assigned post. Also, had a fire occurred while the officer was out of the area and not recognized by him, Control Room operators would have received indication of fire suppression system actuation via installed water flow switches.

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### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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After completion of the asbestos removal work in the Cable Spreading Room, all scaffolding and decking will be removed such that sprinkler system performance will not be hampered.

This event is being reported per 10CFR50.73(a)(2)(i) as an operational condition prohibited by TS. This Licensee Event Report is also being submitted to meet the Action Statement of TS 3.23.1 which requires a report be submitted to the Commission which outlines the action, the cause of the inoperability and the plans and schedule for returning the sprinkler system to "operable" status.

# Additional Information

No other reportable events could be identified which were the result of the failure of a dedicated fire watch to complete their assigned actions. For information regarding past failures to meet fire watch compensatory measures, reference Licensee Event Reports 87-013, 87-015, 83-061, 83-068, 83-069, 83-075 and 83-076.



General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

June 15, 1988

Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - LICENSEE EVENT REPORT 88-009 - FAILURE TO MAINTAIN CONTINUOUS FIRE WATCH AS REQUIRED BY TECHNICAL SPECIFICATIONS

Licensee Event Report (LER) 88-009 (Failure to Maintain Continuous Fire Watch as Required by Technical Specifications) is attached. This event is reportable to the NRC per 10CFR50.73(a)(2)(i).

James L Kuemin

Staff Licensing Engineer

James L. Luemin

CC Administrator, Region III, NRC NRC Resident Inspector - Palisades

Attachment

JE22