



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

G B Slade
General Manager

October 14, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
LICENSEE EVENT REPORT 91-018 - "UNIDENTIFIED CABLE PENETRATIONS IN THE CONTROL
ROOM"

Licensee Event Report (LER) 91-018 is attached. This event is reportable to
the NRC per 10CFR50.73(a)(2)(i)(B).

Gerald B Slade
General Manager

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

Attachment

9110240018 911014
PDR ADOCK 05000255
E PDR

JE22
11

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) PALISADES PLANT	DOCKET NUMBER (2) 0 5 0 0 0 2 5 5	PAGE (3) 1 OF 0 3
---	---	-----------------------------

TITLE (4)
UNIDENTIFIED CABLE PENETRATIONS IN THE CONTROL ROOM

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)
09	13	91	91	018	00	10	14	91	N/A		0 5 0 0 0
									N/A		0 5 0 0 0

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) 11010	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)						
	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)						
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)						
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)							
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)							
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12)

NAME Cris T Hillman, Sr. Licensing Engineer	TELEPHONE NUMBER
	AREA CODE: 6 1 6 NUMBER: 7 6 4 - 8 9 1 3

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)

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

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

ABSTRACT

On September 13, 1991, at approximately 0930 hours, three 4-inch diameter holes adjacent to control room floor penetration H-131 were found by electrical contractors employed by the configuration control project. At the time of discovery the plant was operating at approximately 100% power. The three holes (penetrations) were not identified on existing record prints. The cables routed through the unidentified penetrations were also not identified on existing electrical prints.

The cause of this event is indeterminate. No records could be found describing the installation, maintenance or surveillance of these penetrations.

The immediate corrective action taken was to initiate hourly fire tours in the area of the penetrations and determine if the penetrations were adequately sealed for control room HVAC and 10 CFR 50, Appendix R requirements and seal if necessary. Proposed long term corrective action includes: identifying the penetrations and updating the appropriate drawings, adding the new penetration seals to the technical specifications surveillance program and to the equipment data base and inspecting the cable spreading room ceiling for additional open or unidentified penetrations into the control room and initiating corrective action as required.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Palisades Plant	DOCKET NUMBER (2) 0 5 0 0 0 2 5 5	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	— 0 1 8	— 0 0	0 2	OF 0 3

TEXT (If more space is required, use additional NRC Form 364A's) (17)

EVENT DESCRIPTION

On September 13, 1991, at approximately 0930 hours, three 4 inch diameter holes adjacent to control room penetration H-131 [PEN] were found by electrical contractors employed by the configuration control project. At the time of discovery the plant was operating at approximately 100% power. The three holes (penetrations) were not identified on existing record prints. Approximately 120 cables [CBL3] that are routed through the unidentified penetrations were also not identified on existing electrical prints. It was immediately determined that the penetrations were adequately sealed to meet control room HVAC requirements. [The System Engineer verified that the control room HVAC dampers were in the "normal" position (40% open) and that the control room environment was being maintained at one-eighth inch (water column) pressure.] However, it was not immediately known if the penetrations were adequately sealed to meet 10 CFR 50, Appendix R requirements.

The penetrations were placed on the hourly fire tour and a work request was initiated to seal the penetrations.

This event is reportable to the NRC per 10CFR50.73(a)(2)(i)(B).

CAUSE OF THE EVENT

The cause of this event is indeterminate. No records could be found describing the installation, maintenance or surveillance of these penetrations.

This event did not involve the failure of any equipment important to safety.

ANALYSIS OF THE EVENT

A review of plant electrical drawings indicates that these penetrations have never been listed or shown on the drawings nor do they appear under any number in the plant equipment data base. From the cable spreading room ceiling the penetrations are hidden by marinite board circuit separation panels. From the control room side, the floor penetrations are inside a cabinet and are covered by cables. "Flamastic" (a fire retardant sealing agent) covering the H-131 penetration overflowed the H-131 penetration and obscured them from view. The penetrations are not listed on Surveillance Procedure No. RT-53 and, therefore, have not been inspected on a periodic basis as required by Technical Specifications.

A review of past maintenance on penetration seals in the vicinity of these penetrations does not indicate their presence. A review of Specification Changes and Facility Changes for this area did not indicate the installation of these penetrations. One possible explanation came from interviews with the electricians who installed the new seals in these fire barrier penetrations. It appears that some type of sheathing had previously been in place on the cable spreading room ceiling. This statement is based on the fact that discoloration of the concrete and other marks exist around these penetrations.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Palisades Plant	DOCKET NUMBER (2) 0 5 0 0 0 2 5 5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 1 8	— 0 0	0 3	OF	0 3

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

This would seem to indicate that a damming board was once in place may have been removed in late 1988 as part of our asbestos abatement program. A replacement damming board was apparently not installed. A search of the records for the asbestos abatement project showed that most of the work for the project was controlled using the maintenance order system. There was no indication on the work orders that reference any penetrations at or near H-131. The work order package included the control room penetration sealing log, which was also reviewed, but did not indicate the presence of these penetrations. Because of the obscure location of these penetrations, they went unnoticed until the present time when they were found by staff tracing circuits for the Configuration Control Project.

It is unknown as to why the penetrations are not listed on any existing records. It is assumed that these penetrations were originally sealed with "Flamastic", "Kaowool" and marinite board in the 1979 to 1981 time frame by FC-407-13, "Penetration Seals and Fire Stops." This is considered to be another example of design/drawing control problems that exist at Palisades.

The Configuration Control Project is continuing to trace circuits through these penetrations which should lead to more conclusive results in the next few months.

CORRECTIVE ACTION

The immediate corrective action taken was:

1. Initiating an hourly fire tour on the three penetrations.
2. Contacting the System Engineering Group to assist in determining if the penetrations were adequately sealed to meet control room HVAC requirements and 10 CFR 50, Appendix R (Fire Protection) requirements.
3. Initiating a work request to seal the penetrations to meet 10 CFR 50 Appendix R requirements.

Longer term corrective actions include:

1. Identifying the penetrations and updating the appropriate drawings.
2. Adding the new penetration seals to the technical specifications surveillance program and to the equipment data base.
3. Inspecting the cable spreading room ceiling for additional open or unidentified penetrations into the control room and initiating corrective action as required.

ADDITIONAL INFORMATION

None