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U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-277/80-02
50-278/80-02
 Docket No. 50-277
50-278
DPR-44
 License No. DPR-56 Priority _____ Category C

Licensee: Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Facility Name: Peach Bottom Atomic Power Station, Units 2 and 3

Inspection at: Delta and Philadelphia, Pennsylvania

Inspection conducted: January 8 - 11 and 16, 1980

Inspectors: *P. S. Koltay*
P. S. Koltay, Reactor Inspector

2/11/80
 date signed

 date signed

 date signed

Approved by: *S. D. Ebner*
S. D. Ebner, Chief, Engineering Support
Section No. 2, RC&ES Branch

2/26/80
 date signed

Inspection Summary:

Inspection on January 8-11, 16, 1980 (Report Nos. 50-277/80-02; 50-278/80-02)
 Areas Inspected: Routine unannounced inspection of the Fire Protection/Prevention Program including: assignment of functional responsibilities; implementation of administrative controls; fire brigade training; observation of ignition source and combustible materials control; observation of fire protection systems and components; observation of plant modifications; review of surveillance test records associated with the fire protection program; and observation of critical fire areas. The inspection involved 32 hours onsite by one NRC regional based inspector.
 Results: Of the 8 areas inspected, no items of noncompliance were identified in 7 areas; one item of noncompliance was identified in one area. (Infraction - failure to follow procedure for installation of fire-stops).

DETAILS

1. Persons Contacted

Philadelphia Electric Company

- **W. Birely, Engineer - Electric Production
- B. Bowen, Electrical Construction Supervisor
- J. K. Davenport, QA Engineer
- *A. Fulvio, IC Engineer
- *K. N. Mandl, QA Auditor
- *C. A. Mengers, QA Supervisor
- **G. Reid, Engineer - Industrial Section
- *R. Rusczyk, IC Engineer
- *W. T. Ullrich, Plant Superintendent

USNRC

- *E. G. Greenman, Senior Resident Reactor Inspector
- *A. R. Blough, Resident Reactor Inspector

*Denotes those present at the exit interview at the site.

**Denotes those present at the exit interview at the company's headquarters.

2. Fire Protection Prevention Program Review

a. Functional Responsibilities

The inspector reviewed the following procedures:

- Administrative Procedure A-50, Training Program, Appendix E, revision 6 dated 5/16/79,
- Procedure E-8, Fire On Site, revision 4 dated 12/3/75, and verified that the licensee has developed lines of communication for onsite and offsite organizations and assigned responsibilities for fire protection/prevention activities.

No items of noncompliance were identified.

b. Administrative Controls

The inspector reviewed the following licensee document and procedures:

- Administrative Procedure A-30, Plant Housekeeping Controls, revision 0 dated 5/18/78,
- Technical Specification Sections 3.14 and 4.14,

- Procedure E-8, Fire On Site, revision 4, dated 12/3/75, verified that the licensee has developed administrative controls which include:

- (1) Requirements for periodic audits,
- (2) Requirements for indoctrination of all contractor personnel and offsite licensee personnel who work onsite in appropriate administrative procedures relative to fire protection,
- (3) Qualifications of fire brigade members, and
- (4) Identification of actions to be taken by individuals discovering fire and subsequent actions to be taken by the control room operator.

The inspector reviewed Fire Protection Audit Reports A 79-04 PL dated 5/23/79 and A 79-28 PR dated 12/4/79.

No items of noncompliance were identified.

c. Control of Combustibles

The inspector reviewed the following licensee procedure:

- Administrative Procedure A-30, Plant Housekeeping Controls, revision 0, dated 5/18/78, and verified that the licensee has developed administrative controls which require:
- (1) Special authorization for the use of combustible, flammable or explosive hazardous material in safety related areas,
 - (2) Prohibition on the storage of combustible, flammable or explosive hazardous material in safety related areas,
 - (3) The removal of all wastes, debris, rags, oil spills or other combustible materials resulting from the work activity following completion of the activity or at the end of each work shift, whichever is sooner,
 - (4) All wood used in safety related areas to be treated with flame retardant, and
 - (5) Periodic inspection for accumulation of combustibles.

No items of noncompliance were identified.

d. Control of Ignition Sources

The inspector reviewed the following licensee procedures:

- Administrative Procedure A-12, Ignition Source Control Procedure, revision 1 dated 5/2/78,
- Administrative Procedure A-12.1, Procedure for Controlling Firewatch, revision 0 dated 5/25/79, and verified that the licensee has developed procedures which include:
 - (1) Requirements for special authorization for activities involving welding, open flame, or other ignition sources and that they take cognizance of nearby flammable material, cable trays or critical process equipment,
 - (2) Prohibition on smoking in safety related areas, except where "smoking permitted" areas have been specifically designated by plant management.

Administrative procedure A-12 requires that the supervisor, responsible for the cutting or welding operation, evaluate the combustible loading in the proximity of the work area prior to approving the operations. However the procedure does not specify the radius of area from the point of operations that should be examined nor does the procedure address the handling and protection of combustible materials within a specified radius of the work area.

The licensee stated that the procedure will be reviewed and consideration given to the inclusion of applicable fire prevention criteria detailed in the National Fire Protection Association code 51 B "Standard for Fire Protection in Use of Cutting and Welding Processes." Fire Code 51B provides guidance as to the extent of area that should be considered around operations utilizing open flames.

This item is considered unresolved. (277/80-02-1; 278/80-02-1)

e. Fire Fighting Procedures

The inspector reviewed the following licensee procedure:

- Procedure E-8, Fire On Site, revision 4, dated 12/3/75, and verified that the licensee has developed an administrative procedure which includes:
 - (1) Actions to be taken by the fire brigade,
 - (2) Coordination of fire fighting activities with offsite fire departments,

- (3) Actions to be taken by plant superintendent and security guards after notification of fire, and
- (4) Instructions for plant operators and general plant personnel during a fire.

No items of noncompliance were identified.

f. Fire Brigade Training

The inspector reviewed the following licensee procedure:

- Procedure ST/EP-5, Fire Drill, revision 5 dated 8/3/79,
- Procedure ST/EP-10, Local Fire Department Training, revision 0 dated 11/22/77,
- Procedure A-50, Training Procedure, revision 6, dated 5/16/79, and verified that the licensee has developed an administrative procedure which includes:
 - (1) A requirement for announced and unannounced drills;
 - (2) A requirement that local offsite fire department participate in at least one annual drill.

No items of noncompliance were identified.

3. Review of Fire Protection/Preventive Program Implementation

a. Fire Inspections

The inspector reviewed the loss prevention report dated October 25, 1979 prepared by the licensee's insurer, American Nuclear Insurer (ANI). The licensee stated that the recommendations contained in the report are being evaluated and corrective action will be taken as necessary. The recommendations did not involve safety related equipment.

No items of noncompliance were identified.

b. Emergency Drills

The licensee conducts monthly unannounced fire drills. The inspector reviewed the critiques of each fire drill conducted in 1979.

No items of noncompliance were identified.

c. Facility Tour

The inspector examined the yard fire protection equipment including: indicator valves, protection of valves and hydrants against vehicular damage, and contents of hose houses. The inspector examined fire alarms, fire suppression systems, and fire barrier penetration seals, throughout the accessible vital plant areas including, cable spreading room, torus compartments, circulating water pump house, radwaste building, reactor building, turbine building, control room complex and diesel generator building. During the tour of the diesel generator building the inspector identified three 3 inch diameter and one 4 inch diameter open penetrations, one in each of the fire barriers separating adjacent diesel generator building compartments.

While inspecting the cable spreading room at elevation 150 feet, the inspector noted an open four inch diameter electrical penetration in the concrete slab at 165 feet elevation, connecting the cable spreading room with the control room. The penetration is located in the northeast corner of the control room.

Technical Specifications Section 3.14.D.1 states in part that: "Penetration fire barriers protecting the following areas shall be functional... Diesel Generator Rooms... Control Room..."

Technical Specifications Section 3.1.14.D.2 states in part that: "If requirement of 3.14.D.1 cannot be met, establish a continuous fire watch on at least one side of the affected penetration within 1 hour."

Contrary to the requirements of Section 3.14.D.1 and 3.14.D.2 of the Technical Specifications the licensee did not post fire watches in the affected areas. The inspectors notified the licensee of the above conditions.

In accordance with Technical Specifications 3.14.D.2 the licensee established continuous fire watch in the diesel generator building on 1/10/80 at 4 p.m. All penetrations were sealed in the diesel generator building on 1/10/80, in accordance with licensee procedure CDIP-16.

Control room personnel have been notified of the open penetration in the control room floor slab. Control room personnel will act as continuous fire watch while the penetration remains open.

This is an infraction level item of noncompliance. (277/80-02-2; 278/80-02-2)

4. Modifications Required by Amendment Nos. 53 and 53 to DPR-44 and DPR-56

By work observation at the plant site and by examination of records at the company headquarters, the inspector verified licensee compliance with scheduled modification implementation dates identified in table 3.1 of the Fire Protection Safety Evaluation Report (SER). For this determination the inspector examined the following items listed in paragraphs 3.1.1 through 3.1.16 of the SER:

- a. Items SER 3.1.1, Fire Detection Systems, and SER 3.1.2, Water Suppression Systems.

The inspector verified by review of documents that the licensee has completed the design phase of these items.

- b. Item SER 3.1.5, Fire Doors.

(1) The water tight doors in the center section of the circulating water pump structure have been provided with electrical supervision that alarm in the control room.

(2) Two doors leading to the condensate pump room have been upgraded by installing steel plates on both sides of the door louvers.

- c. Item SER 3.1.3, Air Breathing Equipment, and SER 3.1.9, Emergency Lighting.

A supply of 72 canisters for the chemox breathing masks, and 22 portable battery-powered lights has been provided and stored in locked cabinets at elevation 165 feet of the turbine building outside the control room.

- d. Item SER 3.1.19, Communications.

Six additional portable two-way radios have been purchased. The radios are stored in the shift supervisor's office in the control room.

- e. Item SER 3.1.14, Administrative Controls/Procedures.

This item requires the licensee to issue procedures governing:

- a. Periodic maintenance of yard fire hydrants,
- b. Use of smoke removal equipment,
- c. Inspection of fire doors,
- d. Control of combustibles in the control room complex,
- e. Update of prefire strategy plans.

The inspector verified that all of the above procedures are in final stages of development through updating existing procedures or issuing new procedures. The licensee stated that copies of the approved procedures will be submitted to the NRC resident inspector when they become available.

This item is considered unresolved. (277/80-02-03; 278/80-02-03)

f. Item SER 3.1.16, Diesel Fuel Tank Fill connection.

The area around the tank fill connection has been regraded in a manner which precludes a spilled fuel fire from affecting the circulating water pump house.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during this inspection are discussed in paragraph 2d and 4e.

6. Exit Interview

The inspector met with the licensee representatives (denoted in Detail, paragraph 1) at the site on January 11, 1980, and summarized the purpose and scope of the inspection and findings. The inspector also met with licensee representatives at the company's headquarters in Philadelphia on January 16, 1980 and reviewed the status of implementation of the proposed fire protection modifications outlined in Amendment 53 to DPR-44 and DPR-56.