

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

Region I

Report No. 50-333/80-17

Docket No. 50-333

License No. DPR-59 Priority -- Category C

Licensee: Power Authority of the State of New York

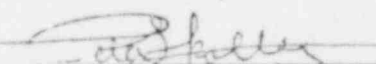
P.O. Box 41

Lycoming, New York 13093

Facility Name: James A. FitzPatrick Nuclear Power Plant

Inspection at: Scriba, New York

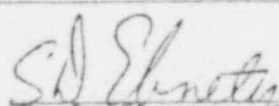
Inspection conducted: September 8-11, 1980

Inspectors: 
P. S. Koltay, Reactor Inspector

10/1/80
date signed

date signed

date signed

Approved by: 
S. D. Ebnetter, Chief, Engineering
Support Section #2, RC&ES Branch

10/1/80
date signed

Inspection Summary:

Inspection on September 8-11, 1980 (Report No. 50-333/80-17)

Area Inspected: Routine, unannounced inspection of the facility's fire barrier penetrations modification including the installation of piping penetration seals; electrical penetration seals; observation of work in-progress; review of procedures, drawings and manuals; and the observation of critical fire areas. The inspection involved 16 hours on site by one NRC regional based inspector.

Results: Of the 5 areas inspected, no items of noncompliance were identified in 3 areas; 3 items of noncompliance were identified in 2 areas (Infraction - paragraphs 2b, 2c, 3a). Deviation from a licensee commitment was identified in one area (paragraph 3b).

REPORT DETAILS

1. Persons Contacted

Power Authority of the State of New York

- *B. Baker, Superintendent of Power
- *N. Brosee, Maintenance Superintendent
- V. Childs, Assistant to Resident Manager
- *M. Cosgrove, Site Quality Assurance Engineer
- *W. Fernandez, Technical Services Superintendent
- J. Helland, JAF Project Engineer
- *D. Holliday, Plant Engineer
- J. Kerfien, Quality Control Supervisor
- *R. Pasternak, Resident Manager
- *V. Walz, Electrical Maintenance Engineer

Tech-Sil Corporation

- M. Troman, Supervisor
- J. Walters, Quality Control

NRC

- *J. Linville, Resident Reactor Inspector

*denotes those present at the exit interview.

2. Fire Barrier Penetration Modification

By examination of specifications, purchase orders, drawings, maintenance forms and quality assurance records, and by discussions with various licensee and contractor personnel, the inspector reviewed the licensee's implementation of the electrical (conduit) and pipe penetration modification. The inspector verified that the modification is in accordance with the requirements of the appropriate sections of Amendment No. 47 to Facility Operation License No. DPR-59.

a. Piping Penetrations (Modification Nos. FI-80-08A and FI-80-08B)

Piping penetration seals of silicone foam, elastomer or silicone high density gel with zipper boots are installed under the supervision and quality control of the Tech-Sil Corporation.

The inspector reviewed the following manuals, procedures and records:

- Tech-Sil Quality Control Manual NP 12-0-101, Revision 1, July 2, 1980.
- Drawing Nos. 11825 FP110A-115A.
- Receiving Inspection Log dated August 13, 1980.
- Certificate of Compliance T.S. Job No. NP 12B, July 31, 1980.
- Test Log, Quality Control Density Tests July 15-26, August 28-September 9.
- Penetration Traceability Log, September 8, 1980.
- Procedure for Sealing Pipe Penetration Sleeves, Revision 0, August 22, 1980.

The inspector observed quality control material density tests, and the placing of damming materials and silicone foam, and verified that the installation of pipe penetration seals is in accordance with applicable procedures. No items of noncompliance were identified.

b. Electrical Penetrations (Modification Nos. FI-80-07A and FI-80-07B)

Electrical Penetration seals of silicone foam and silicone elastomer are installed under the supervision and quality control review of the licensee.

The inspector reviewed the following procedures and documents associated with the electrical penetration modification:

- Procedure for Opening and Sealing Electrical Conduit Sleeves, Revision 5, June 23, 1980.
- Specification NP-12, Damming Materials, January 2, 1979.
- Procedure for Control of Maintenance, No. 10.1.1, Rev. 2, July 1979.

The licensee initiated the modification by issuing a maintenance work request, WRED No. 6979 dated May 20, 1980, and subsequently issuing Work Tracking Form 6079A dated June 27, 1980 and Work Tracking Form 6079B dated June 27, 1980 for sealing penetrations in the Control Room and the Relay Room. The Work Tracking Forms expired with the completion of the 1980 refueling outage.

The licensee also issued Work Tracking Form 6079C dated September 5, 1980 for sealing electrical penetrations in all plant areas with a single limitation which stated, that no secondary containment penetrations to be opened.

Technical Specification 6.8 states: "Written procedures...shall be established, implemented and maintained for the Fire Protection Program."

Licensee's Procedure No. 10.1.1, Procedure for Control of Maintenance, Revision 2, July 19179, Section 7.2, states: "The Work Tracking Form...shall be issued...to properly...track, control and document corrective maintenance for Category 1, Safety Related or QC inspection required work."

The Licensee's Work Request Event Deficiency (WRED) No. 6979 issued May 20, 1980 identifies the Electrical Cable Penetration Modification FI-80-07A as Category 1, Safety Related and QC inspection required.

Contrary to the above, electrical penetrations were opened and sealed outside the areas specified in the work tracking forms including secondary containment seals, several of which were opened on September 8, 1980, after the issuance of restrictions (WTF 6079C) on violating secondary containment integrity. This is an infraction level item of noncompliance. (333/80-17-01).

The opening of penetrations through the secondary containment while the facility is in the power generation mode, appears to be inadequately controlled by the licensee. Thus, the licensee's ability to maintain the required 0.25 inch water column inside the secondary containment is also questionable. This was brought to the attention of the licensee. At the exit interview, the licensee stated that the 0.25 inch water column can be maintained in the secondary containment if the number of simultaneously opened penetrations is controlled. However, penetration seals through the secondary containment will not be opened before the licensee can demonstrate that the integrity of the secondary containment can be maintained. This item is considered unresolved, pending NRC review of the licensee's planned method of control of opening these penetrations. (333/80-17-02).

c. Quality Control

The inspector reviewed the following documents:

- Tech-Sil Quality Control Manual NP 12-0-101, July 2, 1980.
- Quality Assurance Procedure, Quality Assurance Program QAP 2.1, List of Non Safety Related Structures, Systems and Components - Fire Protection.

By review of quality control form TS-QA-5C the inspector noted that two column headings have been altered to allow the QC personnel to inspect only a percentage of the penetrations prepared for sealing.

Technical Specification 6.8 states: "Written procedures...shall be established, implemented and maintained for the Fire Protection Program."

Licensee's Maintenance Procedure No. 57.5, "Procedure for Opening and Sealing Electrical Conduit Sleeves", Revision 5, June 23, 1980 paragraph 8.1, states: "In progress inspection will be conducted in accordance with Tech-Sil Quality Control Manual (NP 12-0-101)...".

Tech-Sil Quality Control Manual NP 12-0-101, Section 210, paragraph 1.4, states: "Record dam approval on Form TS-QA-5C for each penetration filled (where dams are to remain in place) all penetrations above 4 inches."

Contrary to the above, based on the review of documents and discussions with the QC inspector, it appears that not all penetrations requiring permanent **damming** are inspected and the results recorded on Form TS-QA-5C. This is an infraction level item of noncompliance. (333/80-17-03).

3. Facility Tour

a. Observation of Critical Fire Areas

The inspector conducted a tour of accessible vital areas of the facility including the control room, relay room, cable tunnels, and cable spreading room. During the tour the inspector found the fire door (DG 256) separating the East and West Cable Tunnels and the fire door separating the West Cable Tunnel from the Electric Fire Pump Room blocked open. The inspector interviewed workmen in the area and verified that a fire watch was not stationed. The licensee was unaware of the position of the fire doors prior to being notified by the NRC Inspector.

Technical Specification 3.12.F, paragraph a, states: "The fire barrier penetration seals shall be functional for each protected area..." Technical Specification 3.12.F, paragraph b, states: "Within one hour that any of the fire barrier penetrations seals for any protected area is found or made nonfunctional a continuous fire watch shall be established on one side of the fire barrier."

Contrary to the above, the fire door between the East and West Cable Tunnel and the fire door between the West Cable Tunnel and Electric Fire Pump Room were found open and unattended on September 9, 1980 without adequate measures either established or implemented to ensure that a fire watch was in effect. This is an infraction level item of noncompliance. (333/80-17-04)

b. Control of Combustibles/Housekeeping

The inspector observed accumulation of combustible materials in the form of plastic rolls, and collected combustible debris in plastic bags kept within and beneath electrical cable trays in the cable spreading room.

The inspector reviewed Amendment No. 47 to Facility Operating License No. DPR-59. In Section 6 of the document, Administrative Controls, the licensee committed to amend the existing fire protection administrative program to conform to recommendations presented in the NRC's guidance document, "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls and Quality Assurance", including controls over combustibles.

The inspector reviewed the licensee procedures:

- Housekeeping and Cleanliness Control, No. 10.1.7, May 5, 1980,
- Control of Combustibles and Flammable Material, No. 10.1.10, December 19, 1979,

and identified that the following NRC guidelines were not incorporated in the licensee's procedures:

- the removal of all waste, debris, scraps, rags, oil spills, or other combustibles resulting from the work activity in the area following completion of the activity or at the end of each work shift, whichever is sooner,
- periodic inspection for accumulation of combustibles.

The failure to incorporate those additional guidelines into implementing instructions/procedures is considered to be a deviation from the licensee's commitment to the NRC in Amendment No. 47. (333/80-17-05)

4. Unresolved Items

An unresolved item is a matter about which more information is required in order to determine whether it is an acceptable item, an item of noncompliance, or a deviation. An unresolved item disclosed during the inspection is discussed in paragraph 2b.

5. Exit Interview

The inspector met with the licensee representatives (denoted in Details Paragraph 1) at the site on September 11, 1980, and summarized the purpose and scope of the inspection and findings.