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January 22, 1990

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U. S. Nuclear Regulatory Commission Document Control Desk Mail Station P1-137 Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Unit 2 Docket No. 50-368 License No. NPF-6 Licensee Event Report No. 50-368/89-025-00

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), attached is the subject report concerning a personnel error which resulted in not properly identifying Technical Specification fire barriers which rendered the fire barrier penetrations inoperable due to failure to perform surveillance requirements within the appropriate time interval.

Very truly yours,

E. C. Ewing General Manager, Technical Support and Assessment

ECE/DM/sgw attachment

cc:

Regional Administrator Region IV U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

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NRC Form 366 (9-83) U.S. Nuclear Regulatory Commission Approved OMB No. 3150-0104 Expires: 8/31/85

## LICENSEE EVENT REPORT (LER)

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On December 21, 1989, it was identified that a portion of a wall located in the auxiliary building between the 354 and 360 foot elevations had not been previously identified as a Technical Specification fire barrier. As a result, two piping penetrations located in the barrier had not been surveilled as required by Technical Specifications. A visual inspection of one side of the penetrations was performed with no discrepancies identified. It is reasonable to believe since no discrepancies were identified that the penetration fire barriers had previously been functional. Therefore, no safety concerns existed. The root cause of this event was personnel error. During the initial review of plant areas the design configuration on different elevations was not considered. A review of the drawings for ANO-1 and ANO-2 is being performed to ensure any other barriers that exist on different plant elevations have been properly accounted for as Technical Specification barriers. Several barriers have been identified which are located on different plant elevations and a walkdown of these barriers is in progress. A fire watch has been posted when necessary as required by Technical Specifications. The fire barriers which previously have not been identified as Technical Specification fire barriers will be upgraded and a visual inspection of the fire barrier penetrations will be performed. This event is reportable pursuant to 10CFR50.73(e)(2)(i)(B). NRC Form 366A (9-83) Form 1062.01B U.S. Nuclear Regulatory Commission Approved OMB No. 3150-0104 Expires: 8/31/85

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	IDOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
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#### A. Plant Status

At the time of discovery of this condition, Arkansas Nuclear One, Unit Two (ANO-2) was in Mode 1 (Power Operation) operating at 100 percent of rated thermal power. Reactor Coolant System (RCS) [AB] pressure was approximately 2250 psia and RCS temperature about 580 degrees Fahrenheit.

### B. Event Description

On December 21, 1989, while reviewing fire barrier design drawings and a log which lists fire barrier penetrations, it was identified that a portion of a wall (wall 24-S-24) located in the auxiliary building between the 354 and 360 foot elevations had not been previously identified as a Technical Specification fire barrier. As a result, two piping penetrations located in the fire barrier had not been surveilled as required by Technical Specifications. A visual inspection of one side of the penetrations was performed with no discrepancies identified. The other side of the fire barrier penetrations was not inspected due to ALARA concerns.

### C. Safety Significance

Following the discovery that two penetrations had not been inspected within the required Technical Specification time interval, a visual inspection of the penetrations on one side was performed and no significant discrepancies noted. Therefore, it is reasonable to believe that the penetration fire barriers had previously been functional. Based on this, no significant safety concerns existed.

#### D. Root Cause

The root cause of this event was personnel error in that during the initial review to identify Technical Specification fire barriers of ANO-1 and ANO-2 plant areas the design configuration on different elevations was not considered. After initially identifying the Technical Specification required fire barriers, each barrier was surveyed on one side to identify penetrations which existed. In some instances a fire barrier was surveyed from one side of the barrier where the floor slab was at a higher plant elevation than the floor slab on the other side of the barrier. Therefore, a portion of that fire barrier on the other side of the barrier which was being inspected may not have been documented or surveyed.

Additionally, it would be reasonable to assume that a comparison between architectural sectional and fire zone floor plan prints was not performed which could have aided in identifying those portions of fire barriers which need to be surveyed.

#### E. Basis for Reportability

The ANO-2 Technical Specifications require that all penetration fire barriers protecting safety related areas shall be functional at all times. Technical Specification 4.0.3 states that failure to perform a surveillance requirement within the specified time interval shall constitute a failure to meet the operability requirements for a limiting condition for operation. For the purpose of complying with Technical Specifications, the terms functional and operable are considered the same for penetration fire barriers. By failing to inspect the penetration fire barriers within the surveillance interval, the identified penetration fire barriers were technically inoperable, and therefore, the Technical Specification limiting condition for operation was not satisfied. Therefore, this event is reportable pursuant to 10CFR50.75(a)(2)(1)(B), operation prohibited by Technical Specifications.

#### F. Corrective Actions

The portion of wall 24-5-24 which was not identified as a Technical Specification fire barrier and the piping penetrations located in the wall are being upgraded to Technical Specification status.

A review of the drawings (i.e., architectural sectional and fire zone floor plan prints) for both ANO-1 and ANO-2 is being performed to ensure that other barriers which may not have been identified during the initial review due to the design configuration (i.e., exist on different plant elevations) have been properly accounted for as Technical Specification barriers. Several barriers have been

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# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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identified which are located on different plant elevations and a walkdown of these barriers is being performed to identify any existing fire barrier penetrations. A fire watch has been posted when necessary as required by the Technical Specifications. A visual inspection of the penetrations located in these barriers which have not previously been identified as Technical Specificaton fire barrier penetrations will be completed by March 1, 1990.

The identified fire barriers and penetrations which previously have not been identified as Technical Specification fire barriers will be upgraded by June 1, 1990. The procedure governing the inspection of Technical Specification fire barrier penetrations will be revised to include any additional barriers which have been identified prior to the performance of the next required surveillance inspections (for ANO-1, MAY 9, 1990 and for ANO-2, August 5, 1990).

G. Additional Information

Previous similar events where fire barrier penetrations were not surveilled within the required time interval allowed by Technical Specifications were reported in LER 50-368/86-008-00, 50-313/89-026-00 and 50-368/86-015-00.

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].