

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

500A Chestnut Street Tower II

EA-81-30
Recd 4/6/81

April 3, 1981

Mr. Victor Stello, Jr., Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket Nos. 50-259, 50-260, 50-296

Dear Mr. Stello:

Enclosed is our response to your March 20, 1981 letter to W. F. Willis regarding the Browns Ferry Nuclear Plant. Enclosure 1 provides a response, pursuant to 10 CFR Part 2.201, to each item of alleged violation stated in Appendix A of your letter. Also, pursuant to 10 CFR Part 2.205, included in Enclosure 1 are facts addressing "extenuating circumstances" related to each item. Enclosure 2 provides our responses to items of deviation identified in Appendix B of your letter.

With the exception of violation C, the violations in Appendix A of your letter are correct as stated. We do not agree that item C represents a violation because our letter dated April 20, 1978 from J. E. Gilleland to George Lear and discussions with the NRC project manager were sufficient notification for NRC to amend the license if deemed necessary. Only the NRC, not the licensee, can amend an operating license.

We understand and concur with NRC's efforts of strict enforcement. We do believe that TVA has made a strenuous, good-faith effort at compliance and, in general, we have been successful. With all due respect, these isolated incidences do not represent any significant programmatic breakdown. We, therefore, believe the imposition of the 25-percent addition to the civil penalty is not warranted.

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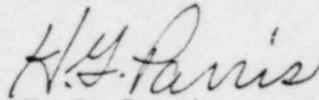
Mr. Victor Stello, Jr.

April 3, 1981

In summary, we do not agree that these nine separate items that occurred over a 5-year period provide a basis for the allegation that TVA's fire protection program has suffered a "significant programmatic breakdown." Therefore, we respectfully request that the civil penalties for violation C be remitted and that the 25-percent addition on the remaining items be removed. We will promptly submit payment as soon as we know the results of your reconsideration of the facts and extenuating circumstances. TVA will be available to discuss these matters with you and will continue to be responsive to the NRC concerns.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



H. G. Parris
Manager of Power

Enclosures

cc: Mr. James P. O'Reilly, Director (Enclosure)
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303

ENCLOSURE 1
TVA RESPONSE TO NOTICE OF VIOLATION AND PROPOSED
IMPOSITION OF CIVIL PENALTIES
IDENTIFIED IN APPENDIX A TO THE MARCH 20, 1981, LETTER
FROM V. STELLO TO W. F. WILLIS
BROWNS FERRY NUCLEAR PLANT

ITEM A - NRC Position

Facility Operating License paragraphs 2.D(a)(b) for units 1 and 2 and paragraph 2.E(2)(b) for unit 3 require the licensee to install automatic preaction sprinkler systems in all areas of the plant required for safe shutdown by the end of the first refueling outage of any of the plant units after August 20, 1976. Unit 1 completed the first refueling outage on January 15, 1978. Areas requiring automatic preaction sprinkler systems were identified in Part X, Section A of TVA's document "Browns Ferry Nuclear Plant Design Changes for the Recovery From the Fire of March 22, 1975," (Recovery Plan), which included the electrical cable area for the RHR service water pumps at the intake pumping structure.

Contrary to the above, an automatic preaction sprinkler system has not been installed in the intake pumping station.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$21,000.

TVA Response

1. Admission or Denial of Violation

The violation is correct as stated.

2. Reason for the Violation

The automatic preaction sprinkler system was not installed in the intake pumping station because of an oversight. All other sprinkler systems addressed in the Facility Operating License and Recovery Plan were implemented and tracked under one Engineering Change Notice.

3. Corrective Steps Taken and Results Achieved

To correct this violation, the sprinkler system is being installed.

As an interim measure, a fire watch has been established in the intake pumping station. This watch will continue until the sprinkler system is installed and tested.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

In the intervening years since this oversight occurred, we have changed the organization and tracking system which allowed this to occur. To determine if other omissions have occurred on Browns Ferry, we have reviewed our fire protection commitments and we have identified one other problem involving a failure to add lighted exit signs. NRC was notified of this in the the February 11, 1981, meeting with J. P. O'Reilly and the NRC Region II staff. A subsequent letter was submitted to NRC on March 20, 1981, stating TVA's efforts to comply with the commitment and requesting a deviation from the commitment.

5. Date When Full Compliance Will be Achieved

The sprinkler system will be installed by May 1, 1981.
Full compliance will be achieved by May 1, 1981.

Basis for Mitigation (Extenuating Circumstances) of the Civil Penalty

Omission of this item was an oversight. However, this item was only part of one of over 200 major modifications and commitments made to the NRC during the fire restoration period at Browns Ferry. We are sure you can understand this, especially considering the number of NRC personnel assigned to Browns Ferry to ensure that we effectively implemented this large number of fire-related commitments.

It is TVA's position that we have always exhibited a "good faith" effort in cooperation with and in support of the NRC. Immediately upon discovery of this omission, we took appropriate corrective actions by establishing a fire watch (January 9, 1981) and initiating the sprinkler system design and installation. There was no willful attempt to not meet this requirement.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25 percent addition of the civil penalty.

ITEM B - NRC Position:

Facility Operating License paragraphs 2.D(1)(e) for units 1 and 2 and 2.E(2)(e) for unit 3 require fire protection features of the emergency battery room complex to be changed to do one of the following: (1) provide a total fire rated barrier enclosure of the facility battery room complex that exceeds the fire load contained in the room, (2) reduce the fire load to be within the fire barrier capability of 1-1/2 hours, or (3) provide a remote manual actuated sprinkler system in each room and provide the 1-1/2 hours fire barrier separation. This change was required to be completed prior to the end of the first refueling outage. Unit 1 completed the first refueling outage on January 25, 1978.

Contrary to the above, the fire protection features provided for the battery rooms do not meet one of the three required modifications. TVA selected modification item 3 and provided a sprinkler system for each emergency battery room; however, a 1-1/2 hour fire barrier was not provided. Ventilation ducts penetrate each battery room and are not equipped with fire dampers at each penetration. This voids the fire resistant rating of each enclosure.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$8,000.

TVA Response:

1. Admission or Denial of Alleged Violation

The violation is correct as stated.

2. Reason for Violation

A damper does not exist in a 12-inch by 8-inch ventilation duct which passes through the fire rated wall between Battery Room No. 2 and the adjacent Communications Battery Room. Neither does a damper exist in a 14-inch by 10-inch ventilation duct which passes through the fire rated wall between Battery Room No. 3 and the adjacent Record Storage Room. These dampers were not provided for in the design for these battery rooms.

3. Corrective Steps Taken and Results Achieved

As an interim measure, a fire watch has been established for elevation 593.0 of the Control Building.

4. Corrective Steps Taken to Avoid Further Violation

To correct the identified conditions, TVA will install 1-1/2 hour fire rated dampers in these two areas by June 30, 1981.

5. Date When Full Compliance Will be Achieved

Full compliance will be achieved by June 30, 1981.

Basis for Mitigation (Extenuating Circumstances) of the Civil Penalty

The battery rooms and their associated battery board rooms comprise each of the battery room complexes. The fire barrier separation philosophy applied and approved by the NRC staff was to prevent a single fire from causing the loss of more than one battery room and its associated board room. We do not believe that omission of the identified dampers could have resulted in the loss of more than one battery room complex due to a single fire since the spatial separation between battery room complex No. 2 and battery room complex No. 3 is approximately 193 feet.

In addition, we responded promptly to the deficiency by immediately establishing a fire watch and immediately initiating action to install fire-related dampers in the two areas.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25 percent addition to the civil penalty.

ITEM C

Facility Operating License paragraphs 2.D(1)(c) and 2.D(1)(d) for units 1 and 2 and paragraphs 2.E(2)(c) and 2.E(2)(d) for unit 3 require a manual dry pipe sprinkler system for the cable spreading rooms and an automatic actuated carbon dioxide system for the cable spreading rooms.

Contrary to the above, the cable spreading rooms' dry pipe sprinkler systems are automatic operation and the carbon dioxide systems are manual in operation. A license change to describe the current operation of the fire suppression systems for the cable spreading rooms has not been obtained.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$5,000

TVA RESPONSE

Admission or Denial of Alleged Violation

We do not agree that this represents a violation.

Basis for Mitigation (Extenuating Circumstances) of the Civil Penalty

In compliance with the requirements of 10 CFR Part 50.59, TVA provided notification to NRC on April 20, 1978, stating TVA's plans to change initiation logic for the carbon dioxide system and the water spray system. The revisions had been recommended by NRC representatives. Employee safety must always be of paramount concern and consideration in plant operations. This change provided immediate safer conditions by reducing the possibility of inadvertent actuation of the carbon dioxide system for all employees entering or working in the cable spreading rooms. We considered our April 20, 1978, letter and discussions with the NRC project manager sufficient notification for NRC to amend the license. Issuance of license amendments is an NRC responsibility.

Nevertheless, TVA provided a request to NRC on March 4, 1981, for an amendment to the operating licenses for units 1, 2, and 3.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the civil penalty.

ITEM D - NRC Position

Technical Specification 3.11.B requires that a continuous fire watch be established in the cable spreading rooms and a patrolling fire watch be established to make hourly checks of other (carbon dioxide) protected locations whenever the carbon dioxide fire protection system is lost.

Contrary to the above, the fire watches for the cable spreading rooms were conducted intermittently and the patrolling fire watch did not enter the auxiliary instrument rooms for hourly checks for all three units when the carbon dioxide system was out of service on October 5, 1980, between 7:12 p.m., and 9 p.m.

This is a Severity Level III Violation (Supplement I.C.2). A similar item was identified in Inspection Report 50-259/80-34.
Civil Penalty - \$5,000.

TVA REPOSE

1. Admission or Denial of the Alleged Violation

The violation is correct as stated, except that it occurred on October 15, 1980, rather than the date of October 5, 1980, as stated in the Notice.

2. Reason for the Violation

The fire watches were posted in the area lacking carbon dioxide protection. However, their instructions did not require them to enter the individual rooms. Therefore, their duties were not performed in the manner specified by the technical specification.

3. Corrective Steps Which Have Been Taken and Results Achieved

Plant procedures have been revised to provide fire watches with more complete instructions. Fire watches are now following these revised instructions which reflect technical specification requirements. Steps will be taken to ascertain that each fire watch understands these new requirements before assuming fire watch duty.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

In the future each fire watch will have written instructions in his possession before beginning the fire watch.

5. Date Full Compliance Will Be Achieved

Full compliance was achieved with issuance of revised administrative instructions. These administrative instructions were revised March 13, 1981.

Basis for Mitigation (Extenuating Circumstances) of the Civil Penalty

The carbon dioxide fire protection system was not the primary fire protection system for the spreader rooms. The high pressure fire protection system (water) is the primary system and was in service, during the event. Fire watches were patrolling in the area of the auxiliary instrument rooms and spreading rooms. The fire detection system was in service. Therefore, three levels of protection (i.e. suppression, detection, and a fire watch) were provided while the backup carbon dioxide system was inoperable. Immediately upon discovery of this item, we took appropriate corrective actions by revising our fire watch program as stated in items (3) and (4) above.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25% addition to the civil penalty.

Item E - NRC Position

Technical Specification Section 4.11.A.1.b requires each high-pressure fire protection system pump to be tested for operability once per month.

Contrary to the above, fire pump No. A was not tested for operability during October 1980.

This is a Severity Level III Violation (Supplement 1.C.2).
Civil Penalty - \$2,000.

TVA RESPONSE

1. Admission or Denial of the Alleged Violation

The violation is correct as stated.

2. Reason for the Violation

Failure to perform the operability test was due to operations personnel erroneously testing the diesel-driven fire pump twice while the "A" motor-driven pump remained untested.

3. Corrective Steps Which Have Been Taken and Results Achieved

We confirmed that the pump has been tested monthly in accordance with technical specifications since October 1980.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

The surveillance tests for the diesel-driven fire pump and the motor-driven fire pumps have been scheduled on different days of the week and more clearly identified by addition of a written description of the test along with the surveillance instruction number.

5. Date Full Compliance Will Be Achieved

Full compliance was achieved on February 2, 1981.

Basis for Mitigation (Extenuating Circumstances) of Civil Penalty

This is a single isolated occurrence that resulted in the wrong pump being tested. There was no willful omission involved. Fire pump "A" had been operated satisfactorily at least twice during the month. Therefore, the failure to test this pump did not result in a degradation of the fire protection system considering the depth of protection together with the acceptable performance of the remaining pumps.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25% addition to the civil penalty.

Item F.1 - NRC Position

Technical Specification Section 6.3.A.10 requires written procedures covering the fire protection and prevention program to be prepared, approved, and adhered to.

1. TVA Browns Ferry Emergency Plan - Fire, Explosion, and Natural Disaster Plan, Section 11 requires each operating crew to participate in a fire drill at least once per three months.

Contrary to the above, each operating crew did not participate in a fire drill at least once per three months during 1980. The 1980 drill participation was: Group 1 - two; Group 2 - one; Group 3 - one; Group 4 - two; Group 5 - one.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$3,000.

TVA RESPONSE

1. Admission or Denial of the Alleged Violation

The violation is correct as stated.

2. Reason for the Violation

The fire drills were not scheduled as required.

3. Corrective Steps Which Have Been Taken and Results Achieved

Immediate steps were taken to ensure that all fire brigade members participated in drills. This action was initiated immediately and was completed within 30 days of the violation being identified.

4. Corrective Steps Which Will Be Taken To Avoid Violation

Administrative procedures have been revised to ensure independent tracking, participation, and critiquing of drills by the safety and fire protection engineering staff.

5. Date Full Compliance Will Be Achieved

Full compliance was achieved on March 3, 1981.

Basis for Mitigation (Extenuating Circumstances) of Civil Penalty

Each crew did participate in drills during the year although all crews did not have quarterly drills. A review of the responses to actual fire alarms revealed that each crew responded to no less than three actual alarms during the year in addition to the drills. Of the five operating crews, three crews participated in at least a drill or response during each quarter. The response of the fire brigade has been observed by management personnel during actual fire alarm responses as well as drills. Drills were conducted and critiqued by both the Nuclear Regulatory Commission and an outside auditing firm with satisfactory results for each drill. In addition, fire brigade reports were reviewed by the Plant Operations Review Committee. These observations and reports indicate no degradation in brigade response or operation.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25% addition to the civil penalty.

Item F.2 - NRC Position

Technical Specification Section 6.3.A.10 requires written procedures covering the fire protection and prevention program to be prepared, approved, and adhered to.

2. TVA Procedure MMI-75, Installation and Repair of Penetration and Fire Stops, Section 6.4.8 limits the maximum number of uncoated (not coated with "Flamemastic" fire resistance material) electrical cables within a cable tray to ten.

Contrary to the above, over ten uncoated electrical cables are installed in cable trays in all three units.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$2,000.

TVA RESPONSE

1. Admission or Denial of the Alleged Violation

The violation occurred as stated.

2. Reason for the Violation

The large number of NRC-required modifications and the tight schedule on those modifications, e.g., LPCI, post-TMI, and security, contributed to the situation. More than 10 uncoated cables were in a tray with the stipulation that coating would be done at the completion of the modification.

3. Corrective Steps Which Have Been Taken and Results Achieved

All trays have been coated with the exception of unit 1 over the scram discharge volume. This area has extremely high radiation fields and cable coating will be completed during the outage scheduled to begin April 10, 1981.

4. Corrective Steps Which Will Be Taken To Avoid Further Violations

Procedures have been revised to clarify coating requirements when more than 10 exposed cables exist in a tray segment. In addition, a periodic quality assurance survey has been initiated.

5. Date Full Compliance Will Be Achieved

Full compliance on all areas except unit 1 has been achieved. Unit 1 will be completed before startup from the refueling outage scheduled to begin April 10, 1981.

Basis for Mitigation (Extenuating Circumstances) of Civil Penalty

No definitive NRC guidelines or industry standards exist concerning uncoated cables. This self-imposed limit of 10 uncoated cables in a cable tray was developed as an administrative control. In addition, control and power cables utilized for the last several years for modifications in the reactor building and control building have a fire retardant outer jacket, with the exception of some cable for annunciator systems. Adequate detection and suppression was provided in all areas where these cables were located. Cables penetrating fire stops were always immediately sealed and coated with Flamemastic the required distance from the fire stop.

Considering that the 10 cable limit is only a subjective administrative control, together with the use of cable having a fire retardant jacket, the presence of detection and suppression, and the immediate coating of cables penetrating fire stops, this situation did not result in degradation of the fire protection system.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25% addition to the civil penalty.

ITEM G - NRC Position

Technical Specification Section 3.11.F states "If it becomes necessary to breach a fire stop, an attendant shall be posted on each side of an open penetration until work is completed and the penetration is resealed." The required attendant was not posted in each of the following examples.

1. The fire door (door No. 632) separating the unit 1 electrical shutdown board rooms is a fire stop and must be maintained in the closed position.

Contrary to the above, door No. 632 was found open due to an inoperative door closer on January 21, 1981, and the required attendants were not posted.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$2,000.

2. The fire stops separating the unit 3 electrical shutdown board rooms include door Nos. 655 and 656 which are required to be maintained in a closed position.

Contrary to the above, door Nos. 655 and 656 were found blocked and wedged in the open position on January 21, 1981, and the required attendants were not posted.

This is a Severity Level III Violation (Supplement I.C.2).
Civil Penalty - \$2,000.

TVA RESPONSE

1. Admission or Denial of the Alleged Violation

TVA denies that this situation is a violation of Technical Specification 3.11.F. However, we acknowledge that industry standards and good operating practice require fire doors to be operable and to be closed.

2. Reason for the Violation

The informal controls in effect were not sufficient.

3. Corrective Steps Which Have Been Taken and Results Achieved

A surveillance program was implemented on March 5, 1981, to inspect for and correct all fire door deficiencies. Reemphasis was placed on maintaining the fire doors in the closed position. Reemphasis of the existing procedures to be observed when a fire door is opened was made to plant personnel.

4. Corrective Steps Which Will Be Taken to Avoid Further Violations

Procedures have been issued to provide for a fire door maintenance and inspection program which complies with Appendix R of 10 CFR Part 50.

5. Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 5, 1981.

Basis for Mitigation (Extenuating Circumstances) of Civil Penalty

This is not a requirement of technical specification 3.11.F. However, the recent issuance of Appendix R to 10 CFR 50 includes requirements for inspection of fire doors. We have implemented these requirements as of March 5, 1981. Procedures have been revised to reemphasize the requirement that a fire watch be posted any time a fire door must be blocked open.

The above described facts present "extenuating circumstances" which provide an acceptable basis for removal of the 25% addition of the civil penalty.

ENCLOSURE 2

TVA RESPONSE TO ITEMS OF DEVIATION LISTED IN APPENDIX B OF THE MARCH 20, 1981, LETTER FROM V. STELLO TO W. F. WILLIS BROWNS FERRY NUCLEAR PLANT

ITEM A - NRC Position:

FSAR Section 10.11.3.1 references the April 21, 1977, TVA letter from J. E. Gilleland to E. G. Case of NRC-NRR as one of the documents containing the fire protection modification commitments made by TVA as a result of the March 22, 1975 fire. The enclosure to this letter identified a number of plant doors to be changed to approved fire doors and doors to be upgraded to equivalent approved fire doors. These modifications were to be completed by the end of the first refueling outage of either unit 1 or unit 2. Unit 1 restarted from the first refueling outage on January 15, 1978.

Contrary to the above, several doors in the control bay portion of the plant, primarily on the 593 and 617 foot elevations, have not been changed to approved type fire doors. Many of these doors contain ventilation louvers and thus do not have a fire resistant rating.

TVA Response:

1. Admission or Denial of the Alleged Deviations

The deviation occurred as stated.

2. Reasons for the Deviation

The letter from J. E. Gilleland to E. G. Case dated April 21, 1977, identified 13 nonlabeled doors with fixed ventilation louvers that would be upgraded to "B" label equivalent construction by making hardware modifications. Our position of equivalency was based on the interpretation of TVA drawings and manufacturers' data. This interpretation was accepted by the NRC in a December 9, 1977, letter. A subsequent review of this commitment indicates that of the 13 louvered doors TVA was to upgrade, only four doors (473, 602, 606, 617) do not meet the intent of this commitment.

The letter also identified 11 doors that were to be replaced with louvered UL labeled fire doors. With four exceptions, these louvered fire doors have been installed as committed. The exceptions involve double doors 462A, 466, 472, and 476 which are provided with fusible link actuated fire louvers. When these doors were installed, our door supplier could not provide approved double doors with louvers and the necessary security hardware. Since this combination was dictated by the existing ventilation and security requirements TVA accepted the doors with certification from the manufacturer that they were identical to labeled construction. We therefore propose not to replace them.

3. Corrective Steps Which Have Been Taken and Results Achieved

As an interim measure, a fire watch has been established for elevations 593 and 617 of the control bay.

TVA will replace doors 473, 602, 606, and 617 with "B" label fire rated doors.

4. Corrective Steps Which Will Be Taken to Avoid Further Deviations

Design personnel have been instructed in what specifications constitute approved construction of fire doors.

5. Date When Full Compliance Will Be Achieved

The "B" label fire rated doors will be installed by October 1, 1981. Full compliance will be achieved by October 1, 1981.

ITEM B - NRC Position:

The applicable code or standard approved by the Commission for the design and installation of sprinkler systems is National Fire Protection Association Standard No. 13 (NFPA-13). NFPA-13 Section 1-8.1.2 states that only approved materials and devices shall be used in sprinkler systems.

Contrary to the above, unapproved fire protection deluge valves are provided for the HPCI sprinkler systems.

TVA Response:

1. Admission or Denial of the Alleged Deviation

TVA does not agree with the deviation as stated.

2. Basis for Denial of the Alleged Deviation

TVA's commitment to provide listed or approved actuation valves applies to those fixed water spray systems and sprinkler systems required to be added during the recovery effort after the March 22, 1975, fire as stated in paragraph 5.2, Section A, Part X of the Recovery Plan.

The fixed water spray systems in the HPCI pump rooms were provided as part of the initial design of fire suppression systems and were installed before the March 22, 1975 fire. The automatic actuation valves presently installed in these systems are solenoid-actuated, horizontal, piston-operated check valves which have proven to be highly reliable and dependable in a number of TVA installations. The manufacturer of these valves has recently obtained an Underwriters Laboratory Listing for a valve very similar to the valves in question. It is therefore TVA's position that these valves are adequate for their intended service and further that their use in these systems which were designed and installed before the fire does not constitute a deviation from commitments made to the Commission as a result of the fire. Therefore, no corrective action by TVA is required. Please note that NFPA-15 should have been referenced as the standard for this type of system instead of NFPA-13.

ITEM C - NRC Position

National Fire Protection Association Standard No. 80 Sections 2-8.2 and 2-8.7 require that automatic closing fire doors be provided with positive latching hardware which automatically engages when the door moves to the closed position.

Contrary to the above, a pair of fire doors (door No. 294) is not provided with automatic latching hardware.

TVA Response:

1. Admission or Denial of the Alleged Deviation

The deviation occurred as stated.

2. Reasons for the Deviation

Door No. 294 was originally designed as a normally closed B label double door with an active and inactive leaf. The inactive leaf is provided with manually actuated flush bolts at the top and bottom. An electronic release device actuated by ionization smoke detectors on either side of the opening was requested by the NRC staff during the post-fire recovery effort. The release device was provided to prevent the spread of fire from one board room to the other assuming the normally closed door was open as a result of maintenance. When this modification was made, the manually actuated flush bolts were not replaced with approved self-latching flush bolts.

3. Corrective Steps Which Have Been Taken and Results Achieved

The existing flush bolts will be replaced with approved self-latching flush bolts.

In the interim, the inactive leaf of door 294 will remain closed with the manual flush bolts engaged and will be inspected daily to ensure it stays in the closed position.

4. Corrective Steps Which Will Be Taken to Avoid Further Deviations

Door 294 is the only fire rated double door which has been provided with a hold-open feature and electronic release devices. All other fire rated double doors are normally closed and the inactive leaf is not required for exit purposes. Therefore, manually actuated top and bottom flush bolts are acceptable as permitted by the exception to paragraph 2-8.2.4 NFPA.80.

5. Date When Full Compliance Will Be Achieved

The existing flush bolts will be replaced with approved self-latching flush bolts by May 29, 1981. Full compliance will be achieved by May 29, 1981.

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FOR CHANGES, PLEASE CONTACT ELAINE SCHALL, 49-27293.

10/24/80