

James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
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315 342-3840



Harry P. Salmon, Jr.
Resident Manager

December 13, 1993
JAFF-93-0662

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

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: LER-93-024:

Fire Protection Hose Station Periodic Testing Discrepancy

Dear Sir:

This report is submitted in accordance with 10CFR50.73(a)(2)(i)(B).

Questions concerning this report may be addressed to
Mr. Donald Simpson at (315) 349-6361.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Harry P. Salmon, Jr.'.

HARRY P. SALMON, JR.

HPS:RYS:tlc

Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center

210003

Handwritten initials 'RYS' and a checkmark.

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LICENSEE EVENT REPORT (LER)

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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James A. FitzPatrick Nuclear Power Plant

DOCKET NUMBER (2)
05000333

PAGE (3)
01 OF 05

TITLE (4)
Fire Protection Hose Station Periodic Testing Discrepancy

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 NAME	DOCKET NUMBER
11	16	93	93	024	00	12	13	93	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
POWER LEVEL (10) 000	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)						
	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)						
	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER						
	20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)						
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)							
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)								

LICENSEE CONTACT FOR THIS LER (12)

NAME
Mr. Donald Simpson, Senior Licensing Engineer

TELEPHONE NUMBER (Include Area Code)
(315) 349-6361

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES
(If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On November 11, 1993, the plant was shutdown and in the cold condition with the Reactor Mode Switch in refuel. A scheduled maintenance outage was in progress. During a weekly NRC Resident Inspector meeting, the inspector questioned what testing was required under the Technical Specification Table 4.12.3 heading "Flow/Hydrostatic Test (1)". Specifically does this heading require opening each hose station valve and verifying water flow.

Initial investigation determined that no flow testing had been performed on Fire Protection hose stations. Following evaluation, it was determined that although flow testing may not have been required in accordance with the Technical Specification basis reference documents, correspondence between the Commission and the Authority in the development of this specification identified a specific flow test. The Authority concluded on November 16, 1993, that flow testing should have been performed. The test procedure was revised and testing completed with satisfactory results.

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

EIIS Codes are in []

Event Description

The plant was shutdown and in the cold condition with the Reactor Mode Switch in Refuel. A Maintenance outage was in progress. Based on a question from the NRC Resident Inspector on November 11, 1993, staff was investigating Technical Specification Table 4.12.3 test requirements for manual fire hose stations [KP] under the heading "Flow/Hydrostatic Test (1)". The Resident Inspector questioned if this heading required opening each hose station valve and verifying water flow.

Following initial investigation on November 11, 1993, it was determined that testing performed under the heading "Flow/Hydrostatic Test (1)" did not include opening each hose station valve or verification of water flow. A review of the Technical Specification Bases, NFPA 14-1978, identified that testing was being performed in accordance with the code guidelines; however, there was no reference to a flow test such as the one in question.

A Deviation Event Report was initiated to evaluate the Technical Specification Bases to determine test requirements and the adequacy of the current test program.

Licensing conducted further review of correspondence between the Commission and the Authority preceding the approval of Technical Specification Amendment 34, which implemented this specification.

- In December, 1976, and again in June, 1977, the Commission provided the Authority with sample Technical Specifications for fire protection testing which were to be used by the Authority in the development of site specific specifications. These specifications both identified a test to "partially open hose station valves to verify valve operability and no blockage".
- In August, 1977, The Authority issued a proposed Fire Protection Technical Specification submittal, which used a column headed, "Flow Test" under hose stations. The basis for this test was the same as in the current Technical Specification, "periodic inspections are in accordance with NFPA guidelines ..." (NFPA 14-1978). The NFPA guidelines did not identify a flow test such as the test identified in the sample Technical Specifications.

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- In November, 1977, the Commission responded to the Authority with a draft Fire Protection Technical Specification. In this draft, the Commission changed Table 4.12.3 to its current Technical Specification form (i.e., "Flow Test" was changed to "Flow/Hydrostatic Test (1)" and Note 1 was added to the table). Note 1 addressed specific fire hose hydrostatic test requirements without any discussion of flow testing.
- In December, 1977, NYPA provided comments on the draft Fire Protection Technical Specification. None of the comments dealt with the hose stations.
- In January, 1978, the commission issued the Fire Protection Technical Specifications in Technical Specification Amendment 34. The hose station portion of the Technical Specification was the same as the draft provided in November, 1977. No change to the hose station test or Table 4.12.3 has occurred since Technical Specification Amendment 34.

On November 16, 1993, the Authority concluded that a "flow test" such as the one in question, should be performed in order to comply with the surveillance requirement of Technical Specification Table 4.12.3. Although the structure of Table 4.12.3 parallels the structure of the sample Technical Specifications, the absence of text in the Table and the failure to identify a specific flow test in the Bases led to incomplete implementation of this specification. Because the Authority did not identify an alternate basis for hose station flow test in the licensing submittal, nor take exception to this specification requirement, then the flow test identified in the sample Technical Specification should have been used as the basis for a required flow test.

Cause

The failure to conduct flow testing of individual fire protection hose stations as required by Technical Specification Table 4.12.3 was the result of incomplete development of the Surveillance Test Program upon implementation of Technical Specification Amendment 34. The cause was human performance error in that the NYPA review of correspondence between the Commission and the Authority in the development of Technical Specification Amendment 34 failed to distinguish the difference between testing requirements of the sample Technical Specifications and the testing performed in accordance with the applicable NFPA code used as the basis for testing in the FitzPatrick Technical Specifications.

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Analysis

The Technical Specification basis source documents have no specific requirement for flow testing of individual hose stations. The Authority review of the sample Technical Specification provided by the Commission did not identify the difference in testing methodology for this section of Table 4.12.3, when compared with the Authority bases documents. Because the Authority did not propose or define an alternate definition of hose station test, the definition included in the Commission sample Technical Specifications provided in 1976 should have been used.

A review of the NFPA code of record (NFPA 14-1978) which forms the basis for this Technical Specification shows no specific flow test requirement for individual hose stations; however, the tabular format and headings of surveillance requirements matched those of the sample specifications provided by the NRC. Although the FitzPatrick Surveillance Test Program for individual hose stations met all requirements of the NFPA code of record which formed the Technical Specification basis, the Commission expectations for flow testing were not included as they should have been. Based upon this determination, the omission is being reported under 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the Technical Specifications.

The safety significance of this test omission is low. Because all testing required by the NFPA code of record was included in the surveillance test program, there was reasonable assurance that hose stations would perform as designed. Upon determining that flow testing should have been performed, the Authority immediately revised the test procedure and tested all applicable hose stations. This testing was completed on November 17, 1993, with satisfactory results.

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Corrective Actions

1. The surveillance test procedure for this specification was revised and the hose station flow testing performed. This action was satisfactorily completed on November 17, 1993.
2. An adequacy review of FitzPatrick Fire Protection Surveillance Test Program is in progress. This review is being conducted in accordance with improved administrative controls. Initial review of all Fire Protection functional test procedures will be completed by December 31, 1993.

Additional Information

Failed Components: None

Previous Similar Events: There have been no other events at this facility where the Surveillance Test Program was implemented in accordance with the Technical Specifications Bases documents, but failed to meet regulatory requirements.