

APPENDIX C

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-313/82-15
50-368/82-12

Dockets: 50-313
50-368

Licenses: DPR-51
NPF-6

Licensee: Arkansas Power and Light Company
Post Office Box 551
Little Rock, Arkansas 72203

Facility Name: Arkansas Nuclear One (ANO), Units 1 and 2

Inspection At: ANO Site, Russellville, Arkansas

Inspection Conducted: June 21-25, 1982

Inspectors:

J. P. Jaudon
J. P. Jaudon, Reactor Inspector, Reactor Project Section C
(Paragraphs 1-21, 32, 34, and 35)

7/30/82
Date

for M. E. Murphy
M. E. Murphy, Reactor Inspector, Reactor Project Section C
(Paragraphs 1, 22-31, 33, and 35)

7/30/82
Date

Approved:

J. P. Jaudon
J. P. Jaudon, Acting Chief, Reactor Project Section C

7/30/82
Date

Inspection Summary

Inspection conducted June 21-25, 1982 (Report 50-313/82-15)

Areas Inspected: Routine, announced inspection of licensee action on 19 specific modifications resulting from the Fire Prevention Safety Evaluation Report (SER). This inspection involved 32 inspector-hours by two NRC inspectors.

Results: Within the 19 areas inspected, 2 apparent violations (failure to electrically supervise or to lock fire doors between adjacent redundant safe shutdown equipment - paragraph 10; and failure to conduct surveillance on a hose reel station in a vital area - paragraph 18) and 1 apparent deviation (fire barrier integrity - paragraph 33) were identified.

Inspection conducted June 21-25, 1982 (Report 50-368/82-12)

Areas Inspected: Routine, announced inspection of licensee action on 20 specific modifications resulting from the Fire Prevention Safety Evaluation Report (SER). This inspection involved 32 inspector-hours by two NRC inspectors.

Results: Within the 20 areas inspected, 1 apparent violation (failure to electrically supervise or to lock fire doors between adjacent redundant safe shutdown equipment - paragraph 10) and 1 apparent deviation (fire barrier integrity - paragraph 33) were identified.

DETAILS

1. Persons Contacted

Arkansas Power and Light Company

- *B. Baker, Operations Manager
- D. Brown, Electrical Engineer
- *L. Duggar, Special Projects Manager
- *E. Ewing, Engineering and Technical Support Manager
- H. Hollis, Security Coordinator
- *D. James, Licensing Engineer
- *P. Jones, I&C Superintendent
- *J. Lamb, Safety and Fire Prevention Coordinator

The NRC inspectors also contacted other plant personnel including administrative, clerical, document and drawing control, and engineering personnel.

*Denotes presence at the exit interview conducted June 25, 1982.

2. Fire Protection and Prevention

The purpose of this inspection was to verify that modifications delineated in the Fire Protection Safety Evaluation Report (SER) for each unit had been completed. The Unit 1 fire protection SER was issued by the NRC on August 22, 1978, and the Unit 2 fire protection SER was published as NUREG-0223 in August 1978. The requirement to complete the modifications delineated in Section 3 of these two SER's has been incorporated in the respective licenses. There were 19 modifications specified for Unit 1 and 20 modifications delineated for Unit 2; however, some of the modifications were identical for both units. Paragraphs 3 through 32 below quote individual requirements from the SER's; unit applicability and SER, Section 3 paragraph reference; and provide the findings of this inspection relative to the requirement.

It should be noted that at the time of the inspection, the licensee was conducting a review of those SER items that affected redundant safe shutdown equipment. These items fall under the provisions of 10 CFR 50, Appendix R, Item III.G. It was found that safe shutdown modifications had, in some cases, been completed on one of the units, but not on the other. This resulted from the fact that in these cases, the details of proposed licensee actions to meet specific SER requirements were reviewed by NRR for one unit but not the other and found to be inadequate (for the unit for which reviewed) to meet the requirements of 10 CFR 50, Appendix R, Item III.G; however, similar action on a virtually identical item on the other unit had been completed by the licensee and was not questioned by NRR.

Licensee representatives informed the NRC inspectors that all items affecting redundant safe shutdown equipment would be reviewed. The results of this review are scheduled to be forwarded to NRR by the licensee by July 1, 1982. This report identifies the safe shutdown items which were never completed under the original SER modification schedule. Violations have not been issued for these incomplete SER requirements, since it was determined from the Licensing Project Managers that incorporation of Appendix R to 10 CFR 50 on February 17, 1981, superseded the SER schedules incorporated into the licenses of Units 1 and 2.

3. Requirement: "Portable radio equipment will be provided and available for fire brigade use."

Applicability and SER Reference: Unit 1 - paragraph 3.1; Unit 2 - paragraph 3.1.

Findings: The NRC inspectors found that portable radios were stored on the first floor of the licensee's administrative building. The portable radios were in a locker which included built-in electrical charging outlets. The portable radios had separate microphones which could be clipped to the user's collar and throat microphones for use under respiratory equipment. Licensee representatives stated that all members of the fire brigade received instructions in the use of the portable radios as part of "Emergency Response" training and that the portable radios were used on some of the drills. The portable radio frequency assigned for fire brigade use was monitored in the control rooms.

There were no violations or deviations identified.

4. Requirement: "Redundant power cables for service water pumps and fuel transfer pumps will be separated by a barrier where redundant cables are in a common manhole in the yard area."

Applicability and SER Reference: Unit 1 - paragraph 3.2; Unit 2 - paragraph 3.2.

Findings: Manholes were not inspected by the NRC inspector because the licensee did not consider that they should be entered during mode 1 (power) operation, which both units were in. From records, it was established that Unit 2 barriers were installed, but for Unit 1 the work had not been done. For Unit 1, correspondence from R. W. Reid, Chief, Operating Reactors Branch No. 4, Division of Licensing, dated October 24, 1980, stated that Item 3.2 of the SER remained unresolved and that this item should be resolved in a manner that would meet the requirements of the

(at that time) proposed Appendix R (to 10 CFR 50). The issue of protection of redundant equipment cables in yard manholes is being reviewed by the licensee as discussed in paragraph 2 of this report.

Within the context of paragraph 2, no violations or deviations were identified.

5. Requirement: "To protect redundant safe shutdown cables in the auxiliary building hallway-elevation 372', either a deluge system actuated by heat and smoke detectors, and coating of cables where redundant cables are in proximity will be provided; or all cables will be coated and smoke detectors and a wet pipe sprinkler system installed."

Applicability and SER Reference: Unit 1 - paragraph 3.3; Unit 2 - paragraph 3.5.

Findings: The NRC inspectors found that the licensee had installed heat and smoke detectors which actuated a deluge system and had coated redundant cables. Although the hallways are separate spaces, licensee action was similar for both. The installed deluge system appeared to meet National Fire Code requirements. The licensee was reviewing the adequacy of action taken as described in paragraph 2 of this report. Pending completion of the licensee's review, the NRC inspectors noted the following:

- a. The barrier material used was not yet accepted as a "3-hour barrier."
- b. There were several terminal boxes that were not covered by barrier material, although the conduits on both sides of them were covered. Examples are terminal boxes 561, 346, and 345.
- c. Conduit above door 57 (Unit 1) appeared to be covered with barrier material over only half of its length.

Resolution of these specific items is considered to be an open item pending completion of the licensee's review under 10 CFR 50, Appendix R, Item III.G. (50-313/8215-04; 50-368/8212-03)

No violations or deviations were identified.

6. Requirement: "A portable water or halon extinguisher will be provided in or adjacent to the control room."

Applicability and SER Reference: Unit 1 - paragraph 3.9; Unit 2 - paragraph 3.13.

Findings: The NRC inspectors found that a small (10 pound) halon (1211) fire extinguisher was permanently mounted in each control room.

No violations or deviations were identified.

7. Requirement: "Portable smoke exhaust units with flexible ductwork will be provided so that three units are available for each ANO-1 and ANO-2."

Applicability and SER Reference: Unit 1 - paragraph 3.13; Unit 2 - paragraph 3.16.

Findings: The NRC inspectors checked three fire carts, one located for Unit 1, one for Unit 2, and one on the turbine deck between the two units. Each of the unit fire carts had two 110 volt portable blowers and flexible ductwork sections. The fire cart, which was common to the two units, had three of the blowers and flexible ductwork pieces.

No violations or deviations were identified.

8. Requirement: "Fixed emergency lights will be provided in the control room independent of existing normal and emergency lighting. Portable hand held, sealed beam lanterns will be provided for fire brigade use."

Applicability and SER Reference: Unit 1 - paragraph 3.14; Unit 2 - paragraph 3.17.

Findings: The NRC inspectors found that the licensee had installed emergency lighting as specified. Licensee representatives stated that this lighting was part of the installation made to meet the requirements of 10 CFR 50, Appendix R, Item III.J. The NRC inspectors had noted similar lighting installations in other plant areas. The fire carts described in paragraph 7 of this report were also found to contain portable hand held, sealed beam lanterns.

No violations or deviations were identified.

9. Requirement: "The reactor coolant pump oil collection system will be upgraded to provide collection capability at all potential leakage points."

Applicability and SER Reference: Unit 1 - paragraph 3.15; Unit 2 - paragraph 3.18.

Findings: Neither oil collection system was actually viewed, because both units were in mode 1. The NRC inspectors did review drawings and photographs of the installation made. It was noted that the design for both units had been reviewed by NRR. R. W. Reid letter of May 11, 1980, and R. A. Clark letter of November 5, 1980, are applicable to

Units 1 and 2, respectively. The NRC inspectors had no questions in this area of the inspection.

No violations or deviations were identified.

10. Requirement: "Fire doors which separate redundant safe shutdown equipment or which separate safe shutdown equipment from large oil hazards will either be locked or provided with electrical supervision to alarm if opened."

Applicability and SER Reference: Unit 1 - paragraph 3.18; Unit 2 - paragraph 3.19.

Findings: The NRC inspectors found that many fire doors had installed electrical supervision, but, except in those cases wherein the fire door also happened to be a security door, the electrical supervision was not activated; i.e., the alarm did not work. It was also found that the only fire doors that were locked were those that were also security doors. Specifically, the fire doors that separated the diesel generator rooms for both Unit 1 and Unit 2 (doors 39 and 259, respectively) were neither locked nor did the installed alarms operate. Since the Table 3 SER requirements are incorporated into the licenses for both units, failure either to have doors 39 and 259 locked or to have operating supervisory alarms on them is an apparent violation. (50-313/8215-01; 50-368/8212-01)

Although this apparent violation uses the doors between diesel generator rooms as an example, the intent of this requirement as gleaned from substantiating paragraphs in the Unit 1 and 2 SER's appears to include any fire door which separates redundant safe shutdown equipment from fire hazards. In this context, the fire door between the diesel generator room and the adjacent hallway for Unit 2 (door 260) and potentially several other doors may have to be considered. The NRC inspectors expressed concern to licensee representatives that all affected doors be identified and included in remedial action taken to resolve this violation.

11. Requirement: "Procedures are being developed or changed to incorporate controls over combustible materials and ignition sources, fire brigade staffing and training, fire fighting procedures, quality assurance provisions, and definition of fire protection duties and responsibilities."

Applicability and SER Reference: Unit 1 - paragraph 3.19; Unit 2 - paragraph 3.20.

Findings: The NRC inspectors reviewed the licensee procedures listed below. These procedures addressed the requirements for administrative procedures related to fire protection and prevention.

- 1015.07, "Fire Brigade Organization and Responsibilities,"
Revision 2, November 30, 1981
- 1023.20, "Fire Plan/Fire Brigade Training," Revision 2,
February 23, 1982
- 1053.01, "Control of Combustibles," Revision 1, January 15,
1982
- 1053.02, "Control of Ignition Sources," Revision 1, February 21,
1981
- 1053.03, "Safety and Fire Prevention Inspection," Revision 1,
May 13, 1981
- 1903.22, "Fire or Explosion," (from Emergency Plan), Revision 3,
April 28, 1982
- 1903.41, "Duties of the Emergency Fire Team," Revision 3,
December 8, 1981

There were no violations or deviations identified.

12. Requirement: "Cables which are from the opposite division to the cables in each switchgear room will be separated by a fire retardant board or blanket where cables are in proximity to each other."

Applicability and SER Reference: Unit 1 - paragraph 3.4.

Findings: The NRC inspectors found that cables from opposite trains were wrapped in blanket material in the switchgear rooms. It was also noted that some cable trays have been sprayed with a fire retardant coating. This item is under review by the licensee; paragraph 2 of this report is applicable.

No violations or deviations were identified.

13. Requirement: "An existing wet pipe sprinkler system will be extended to protect redundant safe shutdown cables."

Applicability and SER Reference: Unit 1 - paragraph 3.5.

Findings: The NRC inspector viewed the extension of the sprinkler system in the condensate demineralizer area. The licensee is also conducting a review of this item; paragraph 2 of this report is applicable.

No violations or deviations were identified.

14. Requirement: "The halon system in the control room false ceiling and floor will be modified to be actuated by smoke detectors. All exposed cables in the false floor space will be coated with a flame retardant coating."

Applicability and SER Reference: Unit 1 - paragraph 3.6.

Findings: The NRC inspectors found that smoke detectors were installed. These actuated the control room halon system. Several false floor panels were pulled, and the cables underneath were found to be coated with flame retardant. The licensee is reviewing this item; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

15. Requirement: "To protect redundant cables, either a deluge system actuated by heat and smoke detectors will be provided, or all exposed cables in cable trays will be coated with a flame retardant coating."

Applicability and SER Reference: Unit 1 - paragraph 3.7.

Findings: The NRC inspectors found that an extensive deluge system was installed in the cable spreading room. The system was activated by smoke and heat detectors. It was noted that review of the licensee's action in this area had not been considered acceptable (R. Reid letter, dated October 24, 1980). This item is under review by the licensee as described in paragraph 2 of this report.

There were no violations or deviations identified.

16. Requirement: "Where redundant diesel generator cables are in proximity, a barrier will be provided between the cables, and the manual sprinkler system will be converted to automatic operation."

Applicability and SER Reference: Unit 1 - paragraph 3.8.

Findings: Fire barriers were found to be installed. It was noted that the deluge system had sprinkler heads installed so that each one covered approximately 100 square feet of area. This item is under licensee review; paragraph 2 of this report is applicable.

No violations or deviations were identified.

17. Requirement: "Smoke detectors will be provided in each control room cabinet which contains safe shutdown equipment. Additional smoke detectors will be provided such that detectors are provided in all safety-related areas containing significant combustibles. Smoke detectors will be provided in

various safety-related areas which contain no combustibles but which contain redundant safe shutdown cabling in conduit. Power supplies for fire detectors will be modified so that all fire detectors will be powered from an emergency power source."

Applicability and SER Reference: Unit 1 - paragraph 3.10.

Findings: The NRC inspectors found smoke detectors installed in every area checked and identified as an area where they were required by the SER. Smoke detector coverage was also checked with licensee representatives who provided marked up plan view drawings by level to indicate detector coverage. Design change packages which addressed smoke detector installation and power supplies were also reviewed.

There were no violations or deviations identified.

18. Requirement: "Manual hose stations accessible to all safety-related equipment on elevation 317' of the auxiliary building will be provided. Manual hose stations will be provided in the reactor building."

Applicability and SER Reference: Unit 1 - paragraph 3.11.

Findings: The NRC inspectors reviewed Design Change Package (DCP) 655. This DCP indicated that hose reel stations HR-39 through HR-48 had been added to the reactor containment and that hose reel station HR-49 had been installed in elevation 317' of the auxiliary building. Because Unit 1 was at power, hose reel stations in the containment could not be checked, but hose reel station HR-49 was visually inspected. It was noted that there were two licensee procedures which affected surveillance of hose reel stations. Procedure 1306.15, "Fire Hose Station Testing and Hydrostatic Test," Revision 1, May 26, 1982, addressed the 18-month and 3-year surveillance requirements of Technical Specifications, paragraphs 4.23.1.b and 4.23.1.c. Procedure 1308.02, "Fire Hose Station Inspection," Revision 1, May 6, 1981, covered the monthly check and repeated the 18-month inspection of Technical Specifications requirements 4.23.1.a and 4.23.1.b.

The NRC inspector noted that Procedure 1308.02 identified HR-49 as being installed in the administrative building; this procedure did not indicate that there was any hose reel station on elevation 317' of the auxiliary building. Subsequent interviews with licensee personnel who conducted the monthly surveillance of fire hose reel stations indicated that there had been monthly surveillance accomplished on the hose reel station identified in DCP-655 as HR-49. Since the Technical Specifications, paragraph 4.23.1 requires, ". . . fire hose stations

protecting safety-related areas shall be demonstrated operable . . . at least once per 31 days by visual inspection . . .", the failure to conduct this surveillance since the completion of DCP-655 (April 1981) is an apparent violation. (50-313/8215-02)

The NRC inspector noted that this was the second instance in the last 6 months when a surveillance requirement was missed at ANO. Although the circumstances reported in NRC Inspection Report 50-368/82-02 are somewhat different, there is an implication of programmatic problems with surveillance. This implication was strengthened by the fact that Procedures 1306.15 and 1308.02 overlapped, apparently without the knowledge of licensee management. This is an open item and will be further investigated during a subsequent inspection. (50-313/8515-06; 50-368/8512-08.

19. Requirement: "The cable penetration fire stop design will be tested, and existing fire stops upgraded where required by the testing."

Applicability and SER Reference: Unit 1 - paragraph 3.12.

Findings: The NRC inspectors reviewed correspondence documenting this item. AP&L letter serial 1-039-5, dated March 9, 1979, proposed the licensee's test plan. This test plan was approved for the NRC by letter (R. W. Reed), dated April 5, 1979. AP&L forwarded some test results and proposed additional testing in a letter, serial 1-060-16, dated June 19, 1980. These test results and the additional testing were acknowledged by NRC letter (R. W. Reid), dated October 24, 1980. AP&L forwarded their final test results in a letter, serial 1CAN00820, dated June 2, 1982. This is considered to be an open item pending final action by NRR on the licensee's letter, dated June 2, 1982. (50-313/8215-05)

There were no violations or deviations identified.

20. Requirement: "The effects of fires involving associated circuits (circuits which are connected to safety systems but perform nonsafety functions) are being evaluated by the licensee. Results of the evaluation will be provided by January 15, 1979. Where a fire involving associated circuits may affect operation of safe shutdown equipment, modifications such as rerouting of cables or installation of relay contacts will be made to preclude disabling of safe shutdown equipment."

Applicability and SER Reference: Unit 1 - paragraph 3.16.

Findings: The licensee is conducting a review of this item; paragraph 2 of this report is applicable. The NRC inspectors noted from correspondence review that previous licensee action on this item had not been considered acceptable.

There were no violations or deviations identified.

21. Requirement: "The manually actuated sprinkler systems in the diesel generator rooms will be modified to automatic actuation."

Applicability and SER Reference: Unit 1 - paragraph 3.17.

Findings: The NRC inspectors checked the diesel generator rooms. It was found that they were equipped with deluge systems actuated by a combination of smoke and flame detectors.

There were no violations or deviations identified.

22. Requirement: "A few vital AC panels and safety-related motor control centers will be provided with drip and spray shields where this equipment is in an area protected with an automatic water suppression system."

Applicability and SER Reference: Unit 2 - paragraph 3.3.

Findings: Drip/spray shields have been installed for the protection of AC Panels 2RS1, 2RS2, 2RS3, and 2RS4. Motor Control Center 2B61 was not inspected because of access limitations but the work required was documented. Motor Control Center 2B51 was inspected and a drip/spray shield had been installed; however, because of the location of a spray head on the water spray system, this panel could be subject to flooding. This was discussed with a licensee representative, and the licensee has agreed to investigate the adequacy of the panel seals and/or relocation of the spray head. This is an open item. (50-368/8212-04)

There were no violations or deviations identified.

23. Requirement: "The red division tray in the vicinity of the green division motor control center will be provided with a fire protective insulation, and the green division cables in the vicinity of the red tray will be sprayed with a flame retardant coating."

Applicability and SER Reference: Unit 2 - paragraph 3.4.

Findings: This item is located in a high radiation area and is being extensively reviewed under Appendix R redundant equipment requirements. It was not inspected; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

24. Requirement: "The existing water spray system in the cable spreading room will be evaluated to the criteria of NFPA-15, 1977 and upgraded as required to meet this code. Flame retardant barriers or cable coating will be provided in areas where redundant safe shutdown cabling is in proximity to each other."

Applicability and SER Reference: Unit 2 - paragraph 3.6.

Findings: The water spray system in the cable spreading room meets the criteria of NFPA-15, 1977. Flame retardant barriers and cable coating have been provided in areas where redundant safety shutdown cabling is in proximity to each other. This item is under licensee review; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

25. Requirement: "Flame retardant barriers or cable coating will be provided in the switchgear rooms where redundant cables are in proximity to each other."

Applicability and SER Reference: Unit 2 - paragraph 3.7.

Findings: Flame retardant barriers and cable coating have been provided in the two switchgear rooms where redundant cables are in proximity to each other. This item is under licensee review; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

26. Requirement: "A fire retardant board will be added to cover two cable trays where redundant diesel generator cables are in proximity to each other."

Applicability and SER Reference: Unit 2 - paragraph 3.8.

Finding: Fire retardant board has been installed to cover the two cable trays that contain redundant diesel generator cables that are in proximity to each other. The NRC inspector found on examination that the boards had been subsequently damaged and no longer meet the installation criteria. This condition was pointed out to a licensee representative and is an open item pending repair or replacement of the boards. (50-368/8212-05)

This item is under licensee review; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

27. Requirement: "A fire retardant board barrier will be installed over the nonsafety-related trays that present combustible pathways between redundant diesel generator cables."

Applicability and SER Reference: Unit 2 - paragraph 3.9.

Findings: The redundant diesel generator cables have been protected by installation of fire retardant boards. This item is under licensee review; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

28. Requirement: "A flame retardant coating will be applied to one conduit containing cable associated with a diesel generator."

Applicability and SER Reference: Unit 2 - paragraph 3.10.

Findings: This area is being reviewed by licensee; paragraph 2 of this report is applicable.

There were no violations or deviations identified.

29. Requirement: "Fire detection devices and water spray system will be provided in the corridor at elevation 386' of the auxiliary building to protect the four channels of the reactor protection system indication."

Applicability and SER Reference: Unit 2 - paragraph 3.11.

Findings: Fire detection devices and a water spray system have been installed and provide protection for the four channels of the reactor protection system.

There were no violations or deviations identified.

30. Requirement: "Additional fire dampers are being installed in ventilation duct penetrations of fire barriers."

Applicability and SER Reference: Unit 2 - paragraph 3.12.

Findings: Properly rated fire dampers have been installed in ventilation duct penetrations of fire barriers.

There were no violations or deviations identified.

31. Requirement:

"a. Heat and smoke collectors will be provided over the smoke detectors in the containment building.

"b. Smoke detectors will be provided in each control room cabinet which contains safe shutdown equipment.

- "c. Additional smoke detectors will be provided as listed in the applicant's letter, dated July 7, 1978, such that detectors are provided in all safety-related areas containing combustibles.
- "d. Smoke detectors will be provided as listed in the applicant's letter, dated July 7, 1978, in various safety-related areas which contain no combustibles, but which contain redundant safe shutdown cabling in conduit.
- "e. Non UL or FM listed detectors in safety-related areas will be replaced with approved devices."

Applicability and SER Reference: Unit 2 - paragraph 3.14.

Findings:

- a. Item a. could not be inspected at this time and will be an open item pending conditions suitable for inspection. (50-368/8212-06)
- b. Item b. is considered satisfactory since smoke detectors have been installed in each control room cabinet which contains safe shutdown equipment.
- c. Items c., d., and e. were inspected on a sampling basis and found satisfactory.

There were no violations or deviations identified.

- 32. Requirement: "Manual hose stations accessible to the lower south piping penetration area will be provided. The 75-foot length of hose at the hose station will be replaced with a 100-foot length of hose. Manual hose stations will be provided in the containment building."

Applicability and SER Reference: Unit 2 - paragraph 3.15.

Findings: By record review and interview, the NRC inspectors established that hose reel stations were installed in containment (2HR-43 through 2HR-55) and that the 75-foot hose length had been replaced by a 100-foot length.

The NRC inspectors reviewed DCP 80-2002. This DCP installed three hose reel stations, two on elevation 317' of the auxiliary building and one on elevation 335' of the same building. The licensee identified these hose reel stations as 2-40, 2-41, and 2-42 in Technical Specifications Change Request serial 2CAN018201, dated January 5, 1982. The license for Unit 2, paragraph 2.C.(3)(e), required that these hose reel stations be

installed, "Prior to startup following the first regularly scheduled refueling outage." An additional caveat to this paragraph states, "Technical Specifications covering these items should be proposed not later than 90 days prior to implementation." DCP 80-2002 indicated that the actual installation of hose reel stations 2-40, 2-41, and 2-42 occurred in the fall of 1980, although the DCP was not closed out until January 1982. The startup after refueling occurred during the summer of 1981. The Technical Specification change request was submitted in January 1982. The licensee had apparently met the license requirement which allowed continued operation after refueling by installation of the hose reel stations but had failed to conform to the caveat concerning timeliness of a supporting Technical Specification change request.

The NRC inspectors reviewed licensee surveillance Procedure 1302.02, "Fire Hose Station Inspection," Revision 1, May 6, 1981; this procedure identified hose reel stations 2HR-41, 2HR-42, and 2HR-43 as being located in the new maintenance area. The NRC inspectors also interviewed licensee personnel who normally conduct the monthly surveillance of hose reel stations. It was established that no monthly surveillance had ever been conducted on hose reel stations identified in DCP 80-2002 as "2-41, 2-42, and 2-43." The NRC inspectors concluded that equipment required by license condition had been installed but its operability had not been demonstrated. This is considered to be an unresolved item. (50-368/8212-07)

Because of the implication raised by this item that the licensee is operating outside of license conditions, the following actions merit further consideration:

- a. Immediate corrective action taken to demonstrate operability of license required equipment systems.
- b. Determination of the causes for failure to adhere to the license caveat on timely submission of a Technical Specification change request and corrective action taken or proposed to preclude repetition in the future.

This is also an unresolved item. Since it is so closely related to the unresolved item, identified above, it will be tracked by the same identifying number.

33. Fire Barrier Penetrations

During this inspection, the NRC inspectors noted that electrical conduits were penetrating fire door lintels at Doors No. 46, 259, 260, and 271. These penetrations had unsealed air gaps external to the conduits. Branch Technical Position 9.5-1, "Guidelines for Fire Protection for Nuclear Power Plants," in paragraph C.4.c.(3) stipulates that, "(3) Cable and cable tray penetration of fire barriers (vertical and horizontal) should

be sealed to give protection at least equivalent to that required of the fire barrier."

This is an apparent deviation. (50-313/8215-03; 50-368/8212-02)

34. Unresolved Items

An unresolved item is a matter about which more information is required in order to ascertain whether it is an acceptable item, a violation, or a deviation. One unresolved item is discussed in paragraph 32 of this report.

<u>Item No.</u>	<u>Description</u>
50-313/8212-07	Operability of required equipment and failure to submit Technical Specification change as directed by Licensee condition.

35. Exit Interview

An exit interview was conducted June 25, 1982, with those personnel denoted in paragraph 1 of this report. At this exit interview, the NRC inspectors summarized the scope and findings of the inspection.