

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-333/82-16

Docket No. 50-333

License No. DPR-59 Priority -- Category C

Licensee: Power Authority of the State of New York

10 Columbus Circle

New York, New York 10019

Facility Name: James A. FitzPatrick Nuclear Power Plant

Inspection At: Lycoming, New York

Inspection conducted: July 20-22, 1982

NRC Personnel: Alan E. Finkel
Alan E. Finkel, Reactor Engineering
Inspector

Aug 16, 1982
date signed

Approved by: D.A. Beckman
D.A. Beckman, Chief, Plant Systems
Section, Engineering Programs Branch

8/18/82
date signed

Inspection Summary: Inspection on July 20-22, 1982 (Report No. 50-333/82-16)

Areas Inspected: Routine, unannounced inspection of the plant Fire Protection/Prevention Program, including: implementation of administrative procedures, fire brigade training, observation of ignition source and combustible material control and observation of critical plant fire areas. The inspection involved 30 hours onsite by one region based inspector.

Results: No violations were identified.

DETAILS

1. Persons Contacted

Power Authority of the State of New York

- * Mr. R. Baker, Superintendent of Power
- * Mr. R. Converse, Operations Superintendent
- * Mr. W. Fernander, Technical Services Superintendent
- * Mr. J. Gray, Acting Director, Nuclear Licensing
- * Mr. L. Guaquil, Director Project Engineering
- * Mr. R. Health, Fire Protection Supervisor
- * Mr. C. McNeill, Resident Manager
- * Mr. T. Teifke, Security, Safety & Fire Superintendent
- * Mr. G. Tiner, Training Specialist

United States Nuclear Regulatory Commission

- * Mr. J. Linville, Resident Inspector

*denotes those present at exit interview.

2. Licensee Action on Previous Inspection Finding

(Open) Unresolved Item (81-05-02): Clarification of fire pump sequential testing requirements. The licensee performs a monthly operational check (T.S. 4.12.A1) per Procedure Nos. F-ST-76B and 76C, during which each pump is tested separately by simulating low leader pressure. The inspector determined that the testing met the intent of Technical Specifications (TS) and was acceptably performed. The TS, however, requires clarification. The pumps are sequentially tested by automatically starting then stopping the electrical pump to permit reduction of system pressure to the lower diesel pump auto start setpoint. The TS presently implies that the electric pump should not be shutdown. The licensee has initiated a Technical Specification change deleting the word sequential and will submit the change to the NRC within the next quarter. This item remains unresolved pending NRC review of the licensee's submittal.

4. (Closed) Unresolved Item (81-15-04): Failure to hydrostatically test fire hoses in outside hose houses. The licensee has issued Procedure FPP 2.13, Fire Hose Hydrostatic Testing Revision 0, dated March 23, 1982. The inspector verified that the hoses in the outside hose houses were hydrostatically tested to the requirements of FPP2.13 and that the procedure requirements exceed the requirements of 10 CFR 50, Appendix R, Section III.E.

5. Facility Tour

During a facility tour the inspector examined the fire protection systems including the fire protection water system, yard fire protection equipment including yard indicator valves, hydrants, and the content of hose

houses. The inspector toured accessible areas including the control room, switch gear room, cable spreading room, diesel generator rooms, battery rooms, fire brigade equipment storage and the west cable tunnel and examined fire detection and alarm systems, automatic and manual fixed suppression systems, interior hose stations, fire barrier penetration seals, fire doors, and fire dampers. The inspector found an accumulation of parts and combustible materials in the west cable tunnel vital area similar to that identified as a violation in NRC Inspection Report 50-333/82-10. The licensee had not yet responded to this violation. The Security, Safety and Fire Superintendent made an inspection of this and other plant areas on July 22, 1982, for compliance with Work Activity Control Procedure (WACP) 10.1.10, Control of Combustibles and Flammable Materials, and initiated action to clean up various areas of the plant through their present program control system.

No additional violations were identified.

6. Fire Protection Program

a. Administrative Controls

The inspector reviewed the licensee's Fire Protection Program and the following selected Administrative Procedures (APs) for compliance with the program and Technical Specifications.

- AP 1.6, Fire Protection Program, Revision 2,
- AP 3.1, Procedure for Maintenance Procedures, Revision 2,
- AP 10.1, Control of Work Activity Control Procedures, Revision 2, and
- AP 8.1, Collection, Storage and Maintenance of Records.

a. Surveillance Procedures

The requirements of the AP's are implemented by the Fire Protection Procedures (FPPs) listed in the table below. The inspector reviewed the 1982 surveillance schedule and records and determined that the schedule, records and performance data complied with the requirements of the APs and Technical Specifications, as applicable.

No violations were identified.

Surveillance Fire Protection Tests

<u>Subject</u>	<u>Fire Protection Procedure (FPP)</u>
Monthly Ladder Checks	2.0
Monthly Fire Equipment Check	2.1
Monthly Hose House Checks	2.2
Weekly Portable Radio Checks	2.3
Fire Protection Inspections	2.4
D.C.C. Monthly Check	2.5
Training Center Monthly Check	2.6
Auxiliary Access Monthly Check	2.7
Main Security Monthly Check	2.8
Warehouse Monthly Check	2.9
Office Trailers Monthly Check	2.10
Maintenance Monthly Check	2.11
Semi-Annual Hydrant Check	2.12
Fire Hose Hydrostatic Testing	2.13

7. Control of Combustibles and Ignition Sources

a. Controls of Combustibles

The inspector confirmed that licensee procedure WACP 10.1.10, Control of Combustible and Flammable Materials, includes the following requirements:

- Prohibition on the storage of combustible, flammable or explosive hazardous material in safety related areas,
- Removal of waste, debris rags, oil spills or other combustible materials from the work activity following completion of the activity or at the end of each work shift, whichever is sooner,
- Wood used in safety-related areas is treated with flame retardent,
- Requirement for periodic inspections for accumulation of combustibles, and
- Special authorization for the use of combustible, flammable or explosive hazardous material in safety-related areas.

b. Control of Ignition Sources and Housekeeping

The licensee has established and implemented procedures for controlling the following types of ignition sources and housekeeping areas.

- WSP-04 Welding Support Procedure - Welding and cutting operations and other open flame ignition sources are controlled by work permits with special requirements to protect safety related equipment and components.

- WCAP-10.17 Housekeeping and Cleanliness Procedure - This procedure defines the methods for keeping plant areas clean with specific requirements for no smoking in safety related areas except where designated by plant management.

c. Effectiveness of Controls

The effectiveness of these controls are being re-evaluated by the licensee due to findings of both resident and region based NRC inspectors as discussed in paragraph 3 above.

8. Fire Brigade Training and Drill Program

The inspector reviewed the licensee's training programs for general plant personnel and the fire brigade including general and specific lesson plans, brigade training sessions, and fire drill and training records. The training records for the last quarter of 1981 and the first half of 1982 were specifically reviewed. The licensee has established and is implementing an acceptable fire training program for general plant personnel and the fire brigade training program complies with the requirements of 10 CFR 50, Appendix R, Section III.H.1.

The inspector's review included the following:

a. Fire Protection Training Program

The inspector reviewed the lesson plans outlined in the licensee's Fire Protection Training Program No. ITP-13 dated June 29, 1982, Revision 3. This procedure establishes requirements for instruction, performance and documentation of the training program. This procedure addresses the following:

- Initial Fire Brigade Training
- Firefighting Practice
- Fire Drills
- Fire Brigade Leadership Training
- Indoctrination and Training for outside fire support agencies
- Retraining

The lesson plans address these subjects in detail with up-dating provisions to upgrade the lesson plans as additional data is available.

b. Fire Brigade Training

The licensee will be conducting their 1983 brigade members practice sessions for at the Cicero Fire Training Facility, Cicero, New York. Practice sessions are presently held at the Niagara Mohawk Fire Training Center but will be discontinued after the present group of brigade members finish their training. The inspector verified that the present training complies with the requirements of 10 CFR 50, Appendix R, Section III.I.2.

c. Drill Program

The inspector reviewed the drill program and records for 1981 and 1982 confirming that the fire brigade members were participating in drills at intervals not to exceed 3 months for each shift fire brigade and that each participant had at least two drills per year.

Assessment of drill effectiveness were made by the training specialist. A back shift drill was being planned but, as of this inspection, the drill date had not been determined.

The inspector witnessed a brigade class demonstration of communication equipment in support of an emergency that required use of self contained breathing equipment to be used. The training specialist assessed each brigade member's performance at the completion of the class exercise. The training followed the lesson plan.

No violations were identified.

9. Refresher Brigade Training

The Fire Protection Training Program provisions for refresher training does not define the method and type of requalification or test that is required for a brigade member who misses a scheduled refresher course. The inspector identified this concern to the training specialist who was preparing a procedure revision to address this matter. The revision was not completed before the close of this inspection.

This item is unresolved pending NRC review of the licensee's action. (333/82-16-01).

10. Fire Protection Water Suppression System Review

The fire protection water suppression system is composed of two subsystems providing fire protection for various plant equipment as described by Drawing FB-49A. The inspector, using the drawings listed in the table below and the associated system test procedures (F-STs), verified that the systems were tested and aligned as required by these procedures. The system testing demonstrated compliance with the test procedures. The test procedures meet the requirements of 10 CFR 50, Appendix R, Sections A, B, and C.

FIRE PROTECTION WATER PIPE AND DELUGE FLOW CONTROL AND ALARM DRAWINGS

- Figure F-OP-33-1 Flow Path - Fire Protection Water Pipe System 76
- Figure F-OP-33-2 Flow Path - Fire Protection Water Pipe System 76
- Figure F-OP-33-3 Fire Protection Water Pipe System 76
- Figure F-OP-33-4 Deluge Flow Control and Alarm Valve Arrangement

-- Figure F-OP-33-5 Deluge Flow Control and Alarm Valve Arrangement.

No violations were identified.

10. Fire Brigade Equipment and Breathing Apparatus

The inspector performed a visual inspection of the fire brigade equipment and breathing apparatus stored in the control room area and in cabinets located at the 272 ft. elevation of the Turbine Building. The inspector verified the general condition of the equipment, that safety lights were working, and that the breathing apparatus was fully charged and in working condition. The inspector also verified that the equipment list on the locker doors matched the actual equipment inventory.

No violations were identified.

11. Fire Protection and Prevention Program Organization

Fire Protection and Prevention Program, Procedure FPP-1.0, Revision 0, divides the program responsibilities among at least four different departments. Centralized responsibility and authority for overall program oversight and administration does not appear to be assigned to the Security, Safety, and Fire Superintendent nor any other individual below the level of Resident Manager or Superintendent of Power, requiring routine problems to be resolved at the latter management levels. Discussions with the licensee staff indicated that this fragmentation of responsibilities and authorities has the potential for degrading program effectiveness based on the limited availability of the senior managers for routine program administration.

Based on discussions at the exit meeting, the Resident Manager plans to review FPP-1.0 to determine whether the organizational approach is viable.

12. Storage and Maintenance of Fire Protection Training Records

The licensee is reviewing and upgrading the facility's QA records management program in response to prior NRC identified problems (Reference: NRC Inspection Report 50-333/78-14). The inspector found that fire brigade member drill and training records were not stored as required by the licensee's QA Program commitment to ANSI N45.2.9, Requirements for Collection, Storage and Maintenance of QA Records. 10 CFR 50, Appendix R, Section III.I.4 requires retention of these records for at least three years.

The Resident Manager advised the inspector that plans for correcting records maintenance and storage deficiencies would be available by October, 1982. This matter is unresolved pending review of the licensee's action (82-16-02).

13. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain if they are acceptable, violations, or deviations. Unresolved items are discussed in Paragraphs 8 and 12.

14. Exit Meeting

The inspector met with the licensee representatives denoted in Paragraph 1 on July 22, 1982, and summarized the purpose, scope, and findings.