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Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

William L Beckman
Plant Manager

February 11, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
LICENSEE EVENT REPORT 91-01 - INCOMPLETE FILLING OF FIRE BARRIER FOAM
PENETRATION SEAL

Licensee Event Report (LER) 91-01 (Incomplete Filling of Fire Barrier Foam
Penetration Seal) is attached. This event is reportable to the NRC per
10CFR50.73(a)(2)(i).

Gregory C. Hiltner for
William L Beckman

William L Beckman
Plant Manager

CC Administrator, Region III, USNRC
NRC Resident Inspector - Big Rock Point

Attachment

OC0291-0001-BL01

9102200140 910211
PDR ADOCK 05000155
S PDR

A CMS ENERGY COMPANY

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Big Rock Point Plant DOCKET NUMBER (2) 050001551 PAGE (3) 1 OF 03

TITLE (4)
INCOMPLETE FILLING OF FIRE BARRIER FOAM PENETRATION SEAL

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(S)	DOCKET NUMBER(S) (8)		
01	10	91	91	001		02	11	91	N/A	050001551		
										050001551		

OPERATING MODE (9) N THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5 (Check one or more of the following) (11)

POWER LEVEL (10) <u>01912</u>	20.402(b)	20.406(a)	80.73(a)(2)(iv)	73.71(b)
	20.406(a)(1)(i)	80.36(a)(1)	80.73(a)(2)(v)	73.71(e)
	20.406(a)(1)(ii)	80.36(a)(2)	80.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 306A)
	20.406(a)(1)(iii)	X 80.73(a)(2)(i)	80.73(a)(2)(vii)(A)	
	20.406(a)(1)(iv)	80.73(a)(2)(ii)	80.73(a)(2)(vii)(B)	
	20.406(a)(1)(v)	80.73(a)(2)(iii)	80.73(a)(2)(viii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
<u>R J Alexander, Technical Engineer</u>	AREA CODE <u>616</u> NUMBER <u>547-6537</u>

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
<u>B</u>		<u>SEAL</u>	<u>LDI</u>	<u>2117</u>	<u>N</u>				

SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15) MONTH 06 DAY 01 YEAR 91

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

Big Rock Point Technical Specification 12.3.7.12 requires that "All penetration fire barriers including fire doors and fire dampers protecting safety-related areas be functional at all times".

Contrary to the above, on January 10, 1991 inspections on three silicone foam fire barrier penetrations were initiated in response to a NRC Information Notice 88-56. Following removal of the damming material on both sides of the foam seal, the seals were inspected for such defects as voids in the foam, gaps along the wall/seal border and cracking within the seal material. Small voids in the foam material were found in two of the three seals. The Shift Supervisor was immediately notified and established a fire patrol to inspect the affected areas once every hour as directed by Technical Specifications. These seals were subsequently repaired on January 11, 1991 and January 16, 1991 and declared operable. In addition, on January 29, 1991 two seals of a somewhat larger size were inspected. One of the two seals has been declared inoperable for the same reasons stated above. Fire patrols once every hour have been established. Repairs are in progress.

The cause of the void defects has been attributed to incomplete filling of the seal cavity during the installation process. Big Rock Point concluded that foam defects in additional seals may exist. Additional inspections and repairs are ongoing and fire patrols will remain in effect until all inspections and required repairs are complete.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Big Rock Point Plant	DOCKET NUMBER (2) 0 5 0 0 0 1 5 5	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	0 0 1	0	0 0 2	OF	0 3

TEXT (if more space is required, use additional NRC Form 305A's) (17)

Description of Event

Big Rock Point Technical Specification 12.3.7.12 requires that "All penetration fire barriers including fire doors and fire dampers protecting safety-related areas be functional at all times".

Contrary to the above, on January 10, 1991 inspections on three silicone foam fire barrier penetrations (#180, #228 and #132) were initiated in response to a NRC Information Notice 88-56. Following removal of the damming material on both sides of the foam seal, the seals were inspected for such defects as voids in the foam, gaps along the wall/seal border and cracking within the seal material. Small voids in the foam material were found in two of the three seals (#180, and #228). These seals were subsequently repaired on January 11, 1991 and on January 16, 1991 and declared operable. In addition, on January 29, 1991 two seals (#71 and #72) of the somewhat larger size were inspected. One of the two seals (#72) has been declared inoperable for the same reasons stated above. Fire patrols once every hour have been established. Repairs are in progress.

This event was considered to be in violation the Technical Specification 12.3.7.12 stated above.

Cause of the Event

The cause of the void defect has been attributed to incomplete filling of the seal cavity during the installation process. This was not discovered at the time of installation because at that time the sealant manufacturer did not recommend removing the damming material after filling. This practice is no longer of concern as long as the damming material is re-installed after inspection.

Corrective Action Taken

The shift supervisor was immediately notified and established a fire patrol to inspect the affected areas once every hour, as directed by Technical Specifications. The repaired seals have been declared operable and fire patrols terminated. The seal undergoing repairs has been declared inoperable and a fire patrol once every hour has been established.

Action Taken to Prevent Recurrence

After contacting the silicone foam manufacturer, Dow Corning, (D217) and a fire barrier penetration seal contractor, Big Rock Point concluded that foam defects in additional seals may exist. All foam penetration seals with damming material left in place were declared inoperable and compensatory one hour fire patrols were initiated. Additional inspections and repairs are ongoing and fire patrols will remain in effect until all inspections and required repairs are complete.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Big Rock Point Plant	DOCKET NUMBER (2) 0 5 0 0 0 1 5 5 9 1	LER NUMBER (3)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT: If more space is required, use additional NRC Form 306A's (17)

Safety Significance

Big Rock Point believes that these minor defects do not significantly diminish the ability of the penetration seals to prevent fire spread because an open path around the penetration did not exist, therefore the barrier was not significantly diminished.