

POWER AUTHORITY OF THE STATE OF NEW YORK

JAMES A. FITZPATRICK NUCLEAR POWER PLANT



CORBIN A. McNEILL, JR.  
Resident Manager

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315-342-3840

SERIAL: July 13, 1982  
JAFP 82-0757

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA. 19406

Attention: Richard W. Starostecki, Director  
Division of Project and Resident Programs

SUBJECT: NRC INSPECTION 50-333/82-10

Dear Mr. Starostecki:

With reference to the inspection conducted by Mr. J. Linville of your office on May 1-31, 1982, at the James A. FitzPatrick Nuclear Power Plant, and in accordance with the provisions of 10 CFR 2.201, we are submitting our response to Appendix A Notice of Violation transmitted by your letter dated June 14, 1982.

APPENDIX A

NOTICE OF VIOLATION

- A. Technical Specification 3.12.F requires that all fire barrier penetration seals be functional for each protected area or that a continuous fire watch be established on one side of the fire barrier.

Contrary to the above:

- (1) One of the unsupervised double doors, a fire barrier penetration, on the Reactor Core Isolation Cooling System enclosure area was not latched at 2:30 P.M. on May 11, 1982 making the seal not functional. There was no fire watch established on either side of the door.
- (2) The supervised fire door from the relay room to the reactor building cable tunnel north, a fire barrier penetration, was propped open making the seal not functional and unattended by a continuous fire watch at 9:00 A.M. on May 17, 1982.

This is a Severity Level IV Violation (Supplement I).

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- B. Technical Specification 6.11 requires that Radiation Protection Procedures be adhered to for all plant operations. Paragraph 2.1.2.3.b).2) of Radiation Protection Procedures, Revision 5, dated January 1982 requires that the Shift Supervisor control the specific key for each Restricted Access Gate.

Contrary to the above, the Shift Supervisor did not have key X-11 to the drywell personnel hatch area gate, a Restricted Access Gate, at about 10:00 A.M. on May 13, 1982 and Key X-11 was not logged out of the Shift Supervisor's key locker.

This is a Severity Level V Violation (Supplement IV).

- C. Technical Specification 6.8(A) requires that written procedures be implemented for the Fire Protection Program. Work Activity Control Procedure 10.1.10 states that storage or ordinary combustible materials in safety related areas is prohibited, that cardboard boxes or miscellaneous packing material shall be removed from safety related areas immediately following unpacking and must not be left unattended, and that significant quantities of combustible waste should be placed in designated receptacles once per shift.

Contrary to the above, the south end of the west cable tunnel, a vital area, is being used to store spare parts packed in combustible materials such as cardboard boxes. From May 10, 1982 until May 19, 1982, empty cardboard packing boxes and a large plastic bag of combustible waste were left unattended in this area.

This is a Severity Level V Violation (Supplement I).

#### RESPONSE TO NOTICE OF VIOLATION

- A. The licensee agrees with the findings.
1. Corrective measures were taken and both fire barriers were properly closed as required. In addition to these violations, the Resident NRC Inspector noted an additional violation on June 8, 1982, when the fire door between the diesel generator switchgear rooms was left open. Immediate action was taken to close the door.
  2. To preclude future violations the following will be accomplished:
    - a. An annunciator response procedure is being written which will require an investigation of an electrically monitored door which develops an alarm condition. An alarm condition is initiated when the door is in an off-normal condition for greater than two minutes.

- b. Fire doors which are provided with automatic hold-open and release mechanisms will be inspected daily to verify that doorways are free of obstructions.
  - c. Normally closed and locked fire doors that are not monitored will be inspected weekly to verify that the doors are locked closed.
3. Full compliance is expected to be achieved by September 1, 1982.
- B. The licensee agrees with the findings.
1. A Radiation Protection Technician had obtained the key to perform a survey without logging the key out. The Technician took the key home at the end of the shift. Upon notification of the missing key, the Technician was called at home to verify that he had the key. The door was checked to determine it was secure. The key was returned that evening by the Technician. Full compliance was achieved with the return of the key.
  2. The Shift Supervisors have been counselled as to their responsibilities. The Shift Supervisor has the key cabinet under his control and he is responsible for the keys therein and the keys which have been signed out.
  3. The licensee believes that the present controls are adequate to preclude future violations. Should the violation be repeated, more stringent management controls will be instituted.
- C. The licensee agrees with the findings.
1. The area in question has been used as a storage and distribution point for the many modifications of an electrical nature. Combustibles have been removed and the area will still be used to store non-combustible items.
  2. A meeting was held with contractor management to reiterate the requirement for housekeeping and the control of combustibles.
  3. Several administrative mechanisms have been initiated to improve the plant's controls with respect to this area of concern:
    - a) The Fire Protection Supervisor will re-emphasize the reduction of combustibles during his periodic site tours required by the plant's procedures.

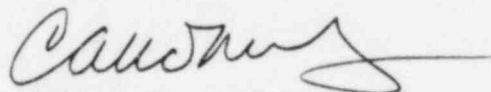
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- b) The periodic cleaning program under development by the Maintenance Department will place increased emphasis into the elimination of buildup of combustibles. This program is scheduled for trial implementation by August 31, 1982.

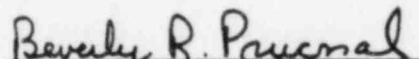
Very truly yours,



CORBIN A. McNEILL, JR.  
RESIDENT MANAGER

CAM:RB:jjh  
Attachment: Distribution List

Subscribed and Sworn to  
before me this 13th day  
of July, 1982.

  
Notary Public

BEVERLY R. PRUCNAL, #4628499  
Notary Public - State of New York  
Appointed in Oswego County

My Commission Expires March 30, 1984

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