

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Report No. 50-213/82-16

Docket No. 50-213

License No. DPR-61 Priority -- Category C

Licensee: Connecticut Yankee Atomic Power Company

P. O. Box 270

Hartford, Connecticut 06101

Facility Name: Haddam Neck

Inspection at: Haddam, Connecticut

Inspection Conducted: August 10-13, 1982

Inspectors: *R. J. Paolino for* 9/3/82
R. J. Paolino, Reactor Engineering date
Inspector

Approved By: *D. A. Beckman for* 9/3/82
D. A. Beckman, Chief, Plant date
Systems Section

Inspection Summary:

Inspection on August 10-13, 1982 (Report No. 50-213/82-16)

Area Inspected: Routine, unannounced inspection of the Fire Protection/Prevention Program including adequacy of administrative controls and procedures; implementation of Technical Specification maintenance/surveillance requirements for fire protection equipment; brigade training/drills and audits, the inspection involved 25 inspection-hours on site by one region based inspector.

Results: Of the five areas inspected, no violations were identified in four areas; one violation was identified in one area (Failure to follow procedures requiring review of procedures every 2 years).

DETAILS

1. Persons Contacted

Connecticut Yankee Atomic Power Company

- D. B. Bement, Nuclear Records Supervisor
- *G. J. Closius, QA Supervisor
- *J. H. Ferguson, Unit Superintendent
- *R. R. Mulligan, Senior Training Inspector
- *D. J. Ray, Engineering Supervisor
- *R. M. Rogozinski, Fire Protection Engineer
- *M. T. Ronzo, Office Supervisor
- *R. Z. Test, Station Services Superintendent

U. S. Nuclear Regulatory Commission

- *L. Briggs, Acting Resident Inspector

*denotes personnel attending exit meeting.

2. Facility Tour

The inspector toured specific accessible vital and non-vital areas at the Haddam Neck Plant to examine fire detection and alarm systems, automatic and manual fixed suppression systems, interior hose stations, fire barrier penetration seals and fire doors. The inspector observed general plant

housekeeping conditions and randomly checked portable fire extinguishers and hose stations. No deterioration of equipment was observed. The inspector noted that the inspection tag attached to each portable fire extinguisher was not being used to record the required monthly inspection and the signature of the individual performing the inspection. The licensee is, however, maintaining a monthly master check list which identifies each portable fire extinguisher. Monthly inspections are documented on this checklist by the individual performing the inspection.

No violations were identified.

2. Fire Protection/Prevention Program

The inspector reviewed the following documents to determine whether the licensee has developed and implemented adequate procedures consistent with the Fire Hazard Analysis, FSAR and Technical Specifications for the Fire Protection/Prevention Quality Assurance Program. Documents examined for this determination include:

- Administrative Procedure No. 1.121, revision 2, "On Site Storage and Handling and Use of Explosive."
- Administrative Procedure No. 1.1-35, revision 8, "Fire Hazards and Housekeeping"
- Administrative Procedure No. 1.1-36, revision 2, "Miscellaneous Gas Cylinders in Plant."
- Administrative Procedure No. 1.1-56, revision 1, "Control of Ignition Sources."
- Administrative Procedure No. 1.1-57, revision 0, "Control of Combustibles."

The inspector verified that the above procedures delineate personnel qualifications and assignments for implementing for fire protection/prevention program. In addition, procedures for the control of combustibles include:

- a. Special authorization for the use of combustible, flammable or explosive hazardous material in safety related areas.
- b. Prohibition on the storage of combustible, flammable or explosive hazardous material in safety related areas.
- c. Requirements for the removal of all wastes, debris, rags, oil spills or other combustible materials resulting from the work activity following completion of the activity or at the end of each work shift, whichever is sooner.
- d. Requirements that all wood used in safety related areas is treated with flame retardant.
- e. Requirements for periodic inspection for accumulation of combustibles.
- f. Housekeeping is properly maintained in areas containing safety related equipment and components.
- g. Transient combustibles are restricted and controlled in safety related areas.
- h. Work authorization, construction permit or similar arrangement is provided for review and approval of modification, construction and maintenance activities which could adversely affect the safety of the facility.

The inspector noted that the revision date on several of the Administrative procedures appeared to indicate an overdue review date. A check of the Plan Operations Review Committee (PORC) minutes and discussions with responsible individuals confirmed that five out of nine procedures examined were not reviewed within the 2 year review period. Safety related procedures in this category are AP 1.1-21, AP 1.1-32, AP 1.1-36, AP 1.1-57 and AP 1.1-59. Section 5.1 of Administrative Procedure 1.1-42 requires that procedures be reviewed no less frequently than every two years. If there are no changes/revisions to the procedure, Section 5.8 of AP 1.1-42 requires the department head to write a Memo to PORC stating that the procedure has been reviewed and that no changes are recommended. ANSI N18.7-1976, Section 5.2.15, endorsed by the NRC approved NUCSO QA Topical Report, revision 4, requires that plant procedures be reviewed no less frequently than every two years. The licensee could not provide documentation that showed compliance with the requirements of ANSI N18.7-1976 and AP 1.1-42. The licensee was informed that this was a violation of 10 CFR 50, Appendix B, Criterion V. (50-213/82-16-01)

4. Qualification/Training

The inspector reviewed the following documents to determine whether the licensee has developed adequate procedures for the qualification and training of Fire Brigade members and other plant personnel. Documents examined for this determination include:

- Plant Technical Specifications
- Training Procedure TR 1.6-1:17; revision 2, "Industrial Health and Safety VIII - General Employee Fire Training/Retraining
- TR 1.6-1.18, revision 1, "Industrial Health and Safety VI - Fire Brigade Instructions/Practice."

- TR 1.6-120, revision 1, "Industrial Health and Safety IX - Fire Watch Training"
- TR 1.6-1.23, revision 0, "Industrial Health and Safety - Fire Brigade Training"
- TR 1.6-1.24 revision 0 "Industrial Health and Safety X - Fire Department Training"
- EPP 1.5-16, revision 1, "Fire"

The above procedures and/or portions thereof were developed to establish training and retraining requirements for brigade members and indoctrination and fire reporting instructions for general plant and contract personnel. In reviewing these documents, the inspector noted that there were no specific requirements established for training or drills. The procedures contain general statements such as 1) "Quarterly drills will be conducted so that as many members of the Fire Brigade as practical have the opportunity to train us a team" and 2) "a fire brigade training program shall be maintained ... and shall meet or exceed the intent of section 27 of NFPA Code - 1976 except that drills/training shall be conducted at least quarterly." 10 CFR 50, Appendix B, Criterion V requires that procedures include appropriate quantitative acceptance criterion for determining satisfactory accomplishments. A check of the training/drill records indicate that the licensee is meeting the requirements of 10 CFR 50, Appendix R for training/drills. The licensee has agreed to revise applicable procedures and instructions to reflect requirements of 10 CFR 50, Appendix R for training/drills. The licensee expects to complete this task by January, 1983. This item remains unresolved pending NRC review of licensee action. (50-213/82-16-02).

5. Equipment Maintenance, Inspection and Tests

The inspector reviewed the following documents to determine whether the licensee has developed adequate procedures which establish maintenance and testing requirements and inspection frequencies for the plant's fire protection systems and fire brigade equipment.

Documents examined for this determination include:

- *-- Surveillance Procedure SUR 5.5-13, revision 10, "Semi-Annual Testing of Smoke Detectors"
- SUR 5.5-18, revision 3, "Cable Vault Fire Protection System Weighing of CO₂ Bottles"
- SUR 5.5-19, revision 3, "PAB Charcoal Filter Fire Protection System Weighing of CO₂ Bottles"
- SUR 5.5-20, revision 3, "Cable Vault CO₂ System, Flow Test, Valve and Ventilation Damper Test"
- SUR 5.5-21, revision 3, "PAB Charcoal Filter Fire Protection System Test"
- *-- SUR 5.5-22, revision 3, "Switchgear Room Fire Protection System Checking Halon Bottles"
- SUR 5.5-23, revision 3, "Switchgear Room Fire Protection System Test."
- SUR 5.5-24, revision 1, "Testing of Spray and/or Sprinkler System"

- *-- SUR 5.5-26, revision 1, "Testing of RCP Heat Detectors."
- *-- Preventive Maintenance Procedure PM 9.5-87, revision 2, "Preventative Maintenance of Diesel Fire Pump"
- *-- PM 9.5-88, revision 3, "Preventative Maintenance of Electric Fire Pump."
- PM 9.5-106 revision 2, "Semi-Annual Testing of Smoke Detectors"
- PM 9.5-109 revision 1, "Checking Proper Operation of Heat Sensors in PAB Charcoal Filters"
- PM 9.5-110 revision 2, "Records Vaults Fire Protection System - System Test"

In addition to examining the above documents, the inspector reviewed maintenance/surveillance records for the items identified by an (*), verifying compliance with established procedures.

No violations were identified.

6. Loss Prevention Report

The inspector reviewed the American Nuclear Loss Prevention Reports of August 10-12, 1981 and March 30-31, 1982 for the Haddam Neck Plant. The 1982 report contains one new recommendation pertaining to the addition of a new yard fire hydrant and a fully equipped hose house near the guard house to replace the yard hydrant which will be eliminated due to construction of temporary engineering building.

No violations were identified.

7. Status of Previously Identified Items

(Closed) Deviation No. 50-213/81-01-01 pertaining to the installation of additional detectors in the area of the cooling water pump and the RHR pump cubicle. The inspector reviewed the telephone log of conversations between Mr. P. Koltay of this office and Mr. J. Ronciaola of Northeast Utilities on March 23, 1981 and April 7, 1981 regarding a commitment to install additional detectors above the cooling water pump and the RHR pump. The inspector verified the detector installation as agreed upon by Mr. R. Test in a conversation of April 9, 1981 with Mr. Koltay.

This item is closed.

8. Unresolved Items

Unresolved items are matters about which more information is required to ascertain whether they are acceptable items, violations or deviations. Unresolved items disclosed during the inspection are discussed in paragraphs 4.

9. Exit Interview

The inspector met with the licensee representatives denoted in Details, Paragraph 1 at the site on August 13, 1982 and summarized the purpose, scope and findings of the inspection.