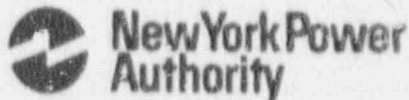


James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342-3840



William Fernandez II
Resident Manager

April 3, 1991
JAFF-91-0196

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

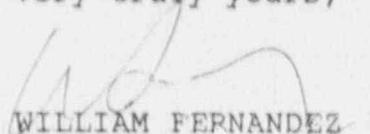
SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 91-002-00
Fire Barrier Penetration Opened
Without Fire Watch

Dear Sir:

This Licensee Event Report is submitted in accordance with
10 CFR 50.73(a)(2)(i)(B).

Questions concerning this report may be addressed to
Mr. Hamilton Fish at (315) 349-6013.

Very truly yours,


WILLIAM FERNANDEZ

WF:HCF:lar

Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center
American Nuclear Insurers

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 0 2	— 0 0	0 2	OF	0 4

TEXT (if more space is required, use additional NRC Form 306A's) (17)

Description

The plant was operating at full power on March 4, 1991. An opening was made in a concrete block wall in preparation for installation of a three-inch telephone cable conduit sleeve. The wall is designated as a fire barrier in NRC Branch Technical Position 9.5-1, Appendix A. The wall separates the telephone equipment room from a corridor area which is common to a stairwell. At approximately 1145 the installation crew left the opening unattended while they went to lunch. At 1226 the fire protection supervisor observed the opening during a routine plant tour. He notified the shift supervisor from a telephone within sight of, and approximately 12 feet from, the opening in the fire wall. He remained at the site until a continuous fire watch was established in the area of the opening at 1240 in accordance with Technical Specification 3.12.F.1.b.

Cause

The work was performed under the authority of a work request approved on December 27, 1990. The work request provided explicit direction to install fire barriers in the conduit in accordance with Installation Procedure IS-E-03. This procedure required, by both cautions and prerequisite steps, the posting of a fire watch for areas listed in an appendix. The work area for this job was not included in the list in the appendix. The work request form identified that a permit may have been required to perform the work and that authorization was required. The Work Permit Request Form was submitted on February 25, 1991. The special instructions or precautions section was not used to provide fire watch instructions in the work authorization portion of the form. Further, the Work Permit Request Form in the "Work Authorization" section, Item 19 "PROC" (for procedure) indicated "NA (Skills Possessed)" instead of referencing the installation procedure number. As a result, the IS-E-03 check sheet which required that a fire watch be posted was not used. The job supervisor was, however, experienced in working on previous penetrations of fire wall barriers. The cause of the event is human error, Cause Code [A]; deficient procedure, Cause Code [D]; and inadequate supervision. The personnel assigned to the job did not recognize the requirement to provide a dedicated fire watch person during the time that the opening remained unsealed. This may have been contributed to by a failure to note these requirements as special instructions or precautions on the Work Permit Request Form and failure to respecify the procedure as "required" on the same form.

Analysis

This event is reported in accordance with the provisions of 10 CFR 50.73(a)(2)(i)(B), as an operation prohibited by Technical Specifications. Section 3.12.F of the Technical Specifications provides that if fire barrier penetration seals separating protected

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED C 18 NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 0 2	— 0 0	0 3	OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

areas are made nonfunctional, a continuous fire watch must be established within one hour. Although the opening was never unattended for more than 45 minutes, no member of the work crew was specifically assigned as a fire watch.

If a fire had occurred during the time that the opening was not attended, it would have had to spread through the three-inch opening, penetrate a second fire wall (although not designated as such in the Appendix A Fire Protection Plan) across an area with no significant fire loading, and then travel more than an additional 138 feet to reach safety-related cable enclosed in steel conduits. Furthermore, these walls form part of the corridor of the front entrance to the building. As such, someone was almost always walking past the work area entering or leaving the building.

The wall in which the opening was made is designated in the Fire Protection Reference Manual as a three-hour fire barrier. However, the telephone equipment room enclosed by the fire wall does not contain safety-related equipment although it is a potential source for initiation of a fire. The other side of the fire wall is a stairwell and does not contain safety-related equipment. A second wall across the corridor is located approximately ten feet from the wall in which the opening was made. This second wall is by actual construction and by construction drawing specification for the door in the wall, intended to be a fire barrier wall to protect the stairwell in accordance with fire safety codes. This wall is breached by a three-hour rated fire door and frame. In addition, there is a lack of combustible material on either side of the door. However, this door and the second wall in which it is installed were not designated as a fire barrier in the documents provided to the USNRC for the Branch Technical Position 9.5-1 Appendix A requirements. Accordingly, although there is no reasonable scenario by which a fire could have initiated and spread from the telephone room through the three-inch opening and damaged the safety-related cable, the event is deemed to be reportable.

Corrective Actions

1. A fire watch was established and maintained until completion of the job.
2. The electricians' foreman has been retrained on fire watch duties and penetration sealing requirements by the lead electrical supervisor and has had this training re-enforced by the department superintendent.
3. Pre-job preparations and briefing in accordance with Plant Standing Order PSO #11 will be conducted for work involving fire barriers unless specifically waived by the responsible lead supervisor or department superintendent.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED DM: NO 3150-0104

EXPIRES 8/21/93

FACILITY NAME (1) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3 9 1	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
			0 0 2	0 0	0 4	OF 0 4

TEXT (If more space is required, use additional NRC Form 365A's) (17)

4. Installation Specification IS-E-03 will be revised to specify additional areas where a fire watch must be posted. It will also standardize requirements for fire watch and penetration sealing when fire barriers are breached.
5. A fire barrier program reassessment is in progress. It will verify the fire barrier requirements of the wall that was breached.