

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-266/82-17(DETP); 50-301/82-17(DETP)

Docket Nos. 50-266; 50-301

Licenses No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company
231 W. Michigan
Milwaukee, WI 53201

Facility Name: Point Beach Nuclear Plant, Units 1 and 2

Inspection At: Point Beach Site, Two Creeks, WI

Inspection Conducted: June 28 through July 1, and July 8, 1982

Inspectors: C. Ramsey

C. Ramsey 9/21/82

J. Ulie

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Approved By: *C. C. Williams*
C. C. Williams, Chief
Plant Systems Section

9/20/82

Inspection Summary

Inspection on June 28 through July 1, and July 8, 1982 (Reports No. 50-266/82-17(DETP); 50-301/82-17(DETP))

Areas Inspected: The inspectors examined the licensee's fire protection and prevention program including Surveillance and Testing Procedures, Fire Protection Administrative Controls and Training, and Manual Firefighting Equipment. The inspection involved 108 inspector-hours on-site by three NRC inspectors.

Results: Of the three areas inspected, no apparent violations were identified in one area; three apparent violations were identified in two areas (Inadequate surveillance testing procedures - Paragraph 2; Nonfunctional penetration fire barrier - Paragraph 2; Incomplete development and implementation of administrative controls - Paragraph 3).

DETAILS

1. Persons Contacted

*G. Reed, Plant Manager
*T. Staskal, Fire Protection Supervisor
*J. Zach, General Superintendent
*T. Koehler, Superintendent of Operations
*G. Maxfield, Assistant to the Superintendent of Operations
*R. Link, Supervisor, Regional Affairs
*F. Zaman, Supervisor, Staff Services
*M. Kaminski, Supervisor, Regional Fire Protection
*D. Bell, Engineer

*Denotes those present at the exit interview on July 8, 1982.

2. Surveillance and Testing Procedures

The inspectors examined the adequacy of the licensee's fire protection systems and surveillance and testing procedures for those systems using the commitments and requirements in Appendix B to 10 CFR 50, Amendments No. 39 and 44 to Licenses No. DPR-24 and DPR-27 including the Fire Protection Safety Evaluation Report issued August 2, 1979, the Point Beach Nuclear Plant Fire Protection Review dated June 20, 1977, the fire protection Technical Specifications and supporting licensee transmittals.

a. Areas of Inspection

(1) Procedures

The inspectors reviewed the following test and inspection procedures and documentation for tests and inspections completed during the period January 1980 through June 1982.

<u>Number</u>	<u>Revision Date</u>	<u>Title</u>
TS-7 Major	8/17/81	Monthly Diesel Fire Pump Functional Test
TS-13 Major	7/14/81	Monthly Fire Equipment Surveillance, Unit 2 Turbine Room
TS-16 Major	5/26/78	Bi-Monthly Fire Detector Testing
TS-17 Major	3/1/78	Annual Testing of Diesel Room Sprinkler Valves

<u>Number</u>	<u>Revision Date</u>	<u>Title</u>
TS-19 Major	3/1/78	Annual Fire Pump Capacity Test
T3-20 Major	8/25/80	Annual Fire System Automatic System and Valve Actuation
TS-25 Major	11/20/80	Alarm Valve Test and Drain Test
TS-26 Major	10/10/81	Fire Main Flow Test

(?) Plant Tours

The inspectors examined fire protection systems and equipment configurations and operability during tours of the following areas:

Turbine Buildings
 Auxiliary Building
 Facade
 Pump House
 Plant Yard

b. Findings

(1) Noncompliance (50-266/82-17-01A; 50-301/82-17-01A): Fire Pump Testing.

Section 5.2.3.2 of the Point Beach Nuclear Power Plant Fire Protection Review, dated June 20, 1977 states in part, "The fire pumps were installed to meet the requirements of NFPA 20."

Section 4.1 of NFPA 20 (1976) states in part, "Pumps shall furnish not less than 150 percent of the rated capacity at a total head of not less than 65 percent of the total rated head. The total shutoff head shall not exceed 140 percent of the total rated head for end suction pumps." Section 6.5 and 8.2 of NFPA 20 (1976) concerning electric motors for fire pumps specifies motor rating requirements for horsepower output, revolutions per minute at full load, voltage, and full load current. Section 12, specifies acceptance, operations and maintenance criterions for fire pumps, field acceptance and yearly tests are described in part as "A yearly test shall be made at full capacity and over to make sure that neither pump nor suction pipe is obstructed. The field acceptance test shall be as good as the manufacturer's certified shop test characteristic curve for the pump being tested within the accuracy limits of the test equipment. For electric

motors at rated voltage. The full load ampere rating shall not be exceeded under any conditions of pump load. The voltage at the motor should not vary more than five percent below or 10 percent above rated voltage during the test. The operating pump speed shall be the speed at which the pumping unit would be expected to operate during a fire. The suction inlet gage as well as the discharge pressure gage shall be read occasionally to see that the inlet is not obstructed by a choked screen or foot valve."

The Basis for Technical Specification 15.4.15 states in part, "The National Fire Protection Association and the plant insurance carrier have specified periodic tests and inspections to demonstrate fire protection equipment operability. The listed tests and inspections include and exceed the requirements of these organizations."

Contrary to the above, the testing procedures in the licensee's annual fire pump capacity tests, TS-19, for the years 1978, 1979, 1980 and 1981 did not include, as a minimum, the requirements specified in NFPA 20. The data collected during the test (discharge pressure and pitot readings) was not adequate data to ensure operability and demonstrate performance characteristics of the pumps in accordance with the original manufacturer's design specifications and NFPA 20. Design points such as pump net discharge pressure, engine speed (RPM) amperes (current) at conditions of pump load and churn pressure (shut off head) were not included in any of the test results reviewed. Therefore, it was not possible to compare pump speed and horsepower to the manufacturer's design specifications.

Review of the results from test conducted show inconsistent pump performance from 1978 to 1981. The test conducted were not run to 150 percent of rated capacity at 65 percent of rated head. However, test results of 130% of rated capacity at 69.7% of rated head in 1978; 129.9% of rated capacity at 80.9% of rated head in 1979; 124.2% of rated capacity at 76% of rated head in 1980; and 128% of rated capacity at 88.9% of rated head in 1981, indicate mechanical malfunctions may be occurring during pump performance.

This is a violation of Technical Specification 15.4.15 and 10 CFR 50, Appendix B, Criterion XI.

- (2) Noncompliance (50-266/82-17-01B; 50-301/82-17-01B): Fire Signalling System Testing.

The Point Beach Nuclear Power Plant fire protection system includes a fire signaling system which transmits fire indicating alarms and supervisory trouble alarms to the control room where they are annunciated at the fire panel. The signalling system transmits indications and alarms for water

flow from sprinkler and deluge systems, fire pump running status, fire pump trouble, and low fire water system pressure.

The test results from the following tests did not include evidence that such alarms and associated circuitry were being tested:

- (a) Monthly Diesel Fire Pump Functional Test (TS-7)
- (b) Annual Testing of Diesel Room Sprinkler Valves (TS-17)
- (c) Annual Fire Pump Capacity Test (TS-19)
- (d) Fire Main Flow Test (TS-26)

Testing procedures for these tests did not incorporate requirements to verify receipt of alarm signal activation at annunciator panels or in the control room. The plant fire protection supervisor indicated that it was assumed verification of alarm signals activation was done in the test, but no specific procedures required it and no other evidence was available that alarms were being received.

This is a violation of 10 CFR 50, Appendix B, Criterion XI.

- (3) Noncompliance (50-266/82-17-01C; 50-301/82-17-01C): Fire Detection System Testing.

Section 2.7 of the Fire Protection Review for Point Beach Nuclear Power Plant, dated June 20, 1977, states in part, "Fire detection systems and devices at Point Beach Nuclear Plant are in accordance with NFPA 72D and are U.L. approved. All fire detection systems installed have both audible and visual alarm in the control room on a separate fire detection master panel which contains a distinctive buzzer alarm, and fire alarm siren."

NFPA Standard 72D (1975), Article 120, paragraph 1232(b) states in part, "Complete and satisfactory tests shall be made of all transmitting devices once every two months or more frequently for all transmitters."

Article 240 of NFPA 72D (1975) states in part, "A system shall be electrically supervised so that the occurrence of a break or ground fault condition of its installation-wiring circuits or in the circuits between the supervising station and the protected premises or buildings which prevents the normal operation of the system, or failure of the main power source, will be indicated at the central supervising station by a distinctive trouble signal."

Chapter 7.4.1 of NFPA 72E states, "Ionization and photo electric smoke detectors may require periodic cleaning to remove dust or dirt which has accumulated. For each detector,

the cleaning, checking operation, and sensitivity adjustments shall be attempted."

Contrary to the above, the testing procedures contained in TS-16, Bi-monthly Fire Detector Testing, did not include the following procedures to assure at the fire detection system would perform satisfactorily in service:

- (a) Verification of control room alarm annunciation,
- (b) Verification of local zone indicating unit alarm annunciation,
- (c) Testing of detector sensitivity, and
- (d) Testing of supervisory circuitry between the control room and the zone indicating units or between the zone indicating units and the detector transmitter.

This is a violation of 10 CFR 50, Appendix B, Criterion XI which states in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

Also, concerning the Surveillance Test Program, Appendix H, Section 11, of the Final Facility Description and Safety Analysis Report (FFDSAR), dated June 30, 1978 for Point Beach Nuclear Power Plant states in part, "Procedures and practices are established and documented to provide a program of periodic testing and continuing surveillance to demonstrate that structures, systems and components continue to perform satisfactorily in service. The measures require test to be performed in accordance with written test procedures which incorporate the requirements and acceptance limits from applicable design documents. Tests include provisions for assuring that all prerequisites have been met. Test results are documented and evaluated to assure test requirements have been satisfied."

- (4) Noncompliance (50-266/82-17-01D; 50-301/82-17-01D): Test Acceptance Criteria.

10 CFR 50, Appendix B, Criterion XI requires establishment of a test program to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service, in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Amendment No. 24 to Appendix H (Quality Assurance Program Description for Point Beach Nuclear Plant), Section 11 of the final facility description and safety analysis report (FFDSAR), dated June 30, 1978 and submitted to the NRC, states in part

"Procedures and practices are established and documented to provide a program of periodic testing and continuing surveillance to demonstrate that structures, systems and components continue to perform satisfactorily in service. The measures require tests to be performed in accordance with written test procedures which incorporate the requirements and acceptance limits (except as noted in Section 5.2) from applicable design documents by appropriately trained and qualified personnel.

Tests procedures include provisions for assuring that all prerequisites for the test have been met, that adequate instrumentation is available and used, and the test is performed under suitable environmental conditions. Test results are documented and evaluated to assure test requirements have satisfied."

Contrary to the above, there was no evidence of written acceptance criterions in the surveillance testing procedures or to be used by the fire protection supervisor in evaluating test results for the following tests completed between January 1980 and June 1982:

- a. TS-7 Monthly Diesel Fire Pump Functional Test,
- b. TS-13, Monthly Fire Equipment Surveillance, Unit 2 Turbine Room,
- c. TS-16, Bi-monthly Fire Detector Testing,
- d. TS-17, Annual Testing of Diesel Room Sprinkler Valves,
- e. TS-19, Annual Fire Pump Capacity Test,
- f. TS-20, Annual Fire System Automatic System and Valve Actuation,
- g. TS-25, Alarm Valve Test and Drain Test and
- h. TS-26, Fire Main Flow Test.

- (5) Noncompliance (50-266/82-17-02; 50-301/82-17-02): Fire Door Limiting Condition for Operation.

Point Beach Nuclear Power Plant Technical Specification 15.3.14 states, "All penetration fire barriers protecting safety related areas shall be functional. In the event of a penetration barrier impairment, a continuous fire watch shall be established on at least one side of the affected penetration barrier within one hour."

Contrary to the above, at the time of inspection on June 28, 1982, the inspectors observed that the west three hour rated fire door between diesel generator rooms 3D and 4D was not functional. The door was found stuck in the opened position. Although it was equipped with an automatic hold open device and fusible link arrangement, fusing of the link would not permit the door to close because the bottom of the door was

held open by its contact with the concrete floor of diesel generator room 4D.

Another example of nonfunctional fire door was the south stairwell exit fire door from the facade on elevation 39', near the elevator. This door had a broken latching mechanism, permitting the door to be opened by increased room air pressure on the facade side of the door which could occur in a fire condition. In such a case, the door could be forced open by heated air and rendered ineffective spreading heat, flames, smoke and hot gases into the stairwell endangering life safety.

c. Discussion

- (1) Unresolved Item (50-266/82-17-03; 50-301/82-17-03): Fire Door Closure Devices.

Most fire doors throughout the plant were equipped with automatic door closure devices with fusible link arrangements. The fusible links on these automatic door closure devices had been painted. Painting of fusible links could retard the action of elements and could impede automatic actuation under actual fire conditions.

To resolve this concern and assure proper operation and actuation of these automatic door closing devices under actual fire conditions, the licensee is requested to provide the following information to:

- (a) What steps have been or will be taken to assure that automatic closing fire doors will in fact close in case of fire.
 - (b) What steps have been or will be taken to preclude the use of foreign paints or chemicals on fusible links?
- (2) Unresolved Item (50-266/82-17-04; 50-301/82-17-04): Fire Door Rating Degradation.

Several fire doors in vital areas throughout the plant appeared to have their fire resistance rating degraded by the attachment of non-builders hardware such as security electronic or mechanical contacts and hasps. In cases where the attachment of such devices were incorporated in the original manufacturers design and construction of the fire doors, the integrity of the fire resistance rating for such doors is attested to by the nationally recognized testing laboratory label affixed to the doors. Where such devices were attached to fire doors after original design and construction, the label affixed to the doors may be invalidated due to these modifications to the doors. (ie., holes drilled

for electrical conduit raceways and other methods of attaching various security devices).

Although it is recognized by this office that a particular security device or component may be labelled and listed by a nationally recognized testing laboratory, improper attachment and backfitting of such labelled devices and/or components to fire doors may degrade the fire resistance rating of the doors.

Section 2-8.9 of NFPA 80 states in part, "The installation of all components of a fire door assembly shall be in accordance with the specific listing of each component. All components shall be installed with the manufacturer's installation instructions and shall be adjusted to function as described in the listing." Any modifications to fire doors by other than the door manufacturer affixing the U.L. label in accordance with U.L. approved design criteria, may void the listed U.L. fire endurance rating of fire doors.

To resolve this concern, the licensee is requested to:

- (a) Provide this office with written evidence that the various security devices installed on fire doors in vital areas throughout the plant are installed in accordance with the specific listing of each component and are installed in accordance with the manufacturer's original design and construction details. This would attest to Underwriters Laboratories Inc. Fire Resistance ratings indicated by affixed labels; or,
 - (b) Provide this office with certified test data from a nationally recognized testing laboratory attesting to the actual fire resistance rating of all fire doors in vital areas that have been retrofitted or modified in any manner other than in the manufacturer's shop to accommodate security devices and other hardware not included in the original door design.
- (3) Unresolved Item (50-266/82-17-05; 50-301/82-17-05): Fire Door Ratings.

The Fire door to the "B" Battery Room and the west fire door to between Diesel Generator Rooms 3D and 4D appear to be the same model and size doors. The "B" Battery Room fire door has a 1-1/2 hour ("B") label affixed to it and the west fire door between Diesel Generator Rooms 3D and 4D has a 3 hour ("A") label affixed to it.

While it is acceptable to install a 3 hour fire door on a wall opening requiring a 1-1/2 hour fire door, it would not be acceptable to install a 1-1/2 hour fire door on a wall opening requiring a 3 hour fire door.

To resolve this item, please provide to this office certified test data attesting to the fire rating on these two doors.

- (4) Unresolved Item (50-266/82-17-06; 50-301/82-17-06): Dual Purpose Bullet Resistant Fire Doors.

The combination dual purpose fire doors and bullet resistant doors installed in plant safety related area wall openings are not listed by Underwriters Laboratories Inc. in a single classification called "Bullet Resisting Fire Doors". This type of label is affixed to the combination doors at Point Beach Nuclear Plant. Such a category does not exist in the 1982 and previous U.L. Building Materials Directories. The special purpose fire doors listed in U.L.'s Building Materials Directories are not listed as Bullet Resistant.

The single U.L. label affixed to these doors indicate these are single door and door assemblies having a combination 3 hour fire resistance and high powered rifle bullet resistance ratings.

While such dual purpose bullet resisting fire doors exist, their design, construction, frame, hinge and latching mechanism are particularly unique.

The inspectors were unable to determine specific assurances of the required fire resistance and bullet resistance of these doors. Therefore, to resolve this item and attest to the combined fire and bullet resistance rating of these doors, the licensee is requested to provide certified test data from a nationally recognized testing laboratory demonstrating the bullet and fire resisting capabilities of the installed door/frame/hard ware configuration.

3. Fire Protection Administrative Control and Training Program

The inspectors examined the licensee's fire protection administrative controls and training program including the control of combustible and flammable materials, training for contractors and employees, transient fire load control, the control of ignition sources including authorization to not have a fire watch, fire brigade training, offsite fire department training, firefighting strategies, control of manually operated valves, and fire protection audits and inspections. These administrative controls and training programs were reviewed using the commitments and requirements in Amendments No. 39 and 44 to Licenses No. DPR-24 and DPR-27 including the fire Protection Safety Evaluation Report issued August 2, 1979, Point Beach Nuclear Plant

Fire Protection Review issued June 20, 1977, the Plant Technical Specifications for the fire protection systems and supporting licensee transmittals.

Licensee transmittals.

a. Areas of Inspection

(1) Procedures

<u>Numbers</u>	<u>Revision Date</u>	<u>Title</u>
FIO 1.1 Minor	04/16/81	Brigade Training
FEP 2.1 Major	03/24/82	Control Room Fire
FEP 2.2 Major	06/15/81	Cable Spreading Room Fire
FEP 2.3 Major	11/05/79	Vital Switchgear Room Fire
FEP 2.4 Major	11/05/79	Diesel Generator Room Fire
FAP 3.0 Minor	05/05/78	Fire Attack Plan - General
FAP 3.1 Minor	05/05/78	Fire Attack Plan for Class "A" Fires
FAP 3.2 Minor	05/05/78	Fire Attack Plan for Class "B" Fires
FAP 3.3 Minor	05/05/78	Fire Attack Plan for Class "C" Fires in Distribution Equip- ment and Machinery
FAP 3.4 Minor	11/03/81	Fire Attack Plan for Class "C" Fires in Cable Runs and Cable Trays
FAP 3.5 Minor	05/0578	Fire Attack Plan for Class "A" and "B" Fires
FAP 3.6 Minor	05/05/78	Fire Attack Plan for Class "A" and "C" Fires

<u>Number</u>	<u>Revision Date</u>	<u>Title</u>
FAP 3.7 Minor	05/05/78	Fire Attack Plan for Class "B" and "C" Fires
FAP 3.8 Minor	05/05/78	Fire Attack Plan for Class "A:", "B", and "C" Fires
FAP 3.9 Minor	05/05/78	Fire Attack Plan for Fires in a Filing Cabinet
FAP 3.10 Minor	05/05/78	Fire Attack Plan for Combustible Gas Fires
PBSP 1.6	05/03/79	Security and PBNP Fire Brigade Interface Procedure
FDO 4.1 Minor	08/24/78	Offsite Fire Drill Involving the Two Creeks Volunteer Fire Department

(2) Reports

<u>Title</u>	<u>Date</u>
Technical Specification Annual Audit 15.6.5.4.A - Corporate Staff Report	December 30, 1981
Quality Assurance Audit Report No. QA 80-500	July 18, 1980
Quality Assurance Audit Report No. QA 81-364	June 3, 1981

(3) Records

The inspectors reviewed records of the Fire Brigade Drills, Practice Session Training, and Offsite Training Record Forms for the period beginning January 1980 through June 1982.

(4) Observations

The inspectors observed and participated in the General Orientation Training and the Radiation Control Training Program on June 28, 1982. The inspectors also observed five hot work activities which were in progress on June 30, 1982.

(5) Plant Tours

The inspectors examined the implementation of the Licensee's Fire Protection Administrative Controls and adequacy of the Plant Manual Fire Fighting Equipment during tours of the following areas on June 28, 29 and 30, 1982

Auxiliary Building
Turbine Building
Facade
Plant Yard

b. Findings

- (1) Noncompliance (50-266/82-17-07A; 50-301/82-17-07A): Contractor Training.

Licensee transmittal dated November 7, 1977, paragraph 1.0.D (5) of attachment No. 1 requires the administrative services supervisor and the health physics supervisor to implement a program for indoctrination of all plant contractor personnel in appropriate administrative procedures relative to fire protection.

Contrary to the above, the licensee has not implemented a program for indoctrinating plant contractor personnel in administrative procedures relative to fire protection. The inspectors talked with the administrative services supervisor, the health physics supervisor, the plant fire protection supervisor, and the plant safety supervisor, none of whom were aware of any such program. The inspectors audited the new employee/contractor orientation program which also failed to cover administrative controls.

This represents a violation of Technical Specifications 15.6.81.8 concerning the implementation of the Fire Protection Program.

- (2) Noncompliance (50-266/82-17-07B; 50-301/82-17-07B): Spill Training.

Licensee transmittal dated November 7, 1977, paragraph 1.0.D. (6) of attachment No. 1 requires the plant safety supervisor and plant fire protection supervisor to implement a program for the instruction of personnel on the handling of leaks or spills of flammable materials related to fire protection.

Contrary to the above, the licensee has not implemented a program for instructing personnel on the handling of flammable leaks or spills.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (3) Noncompliance (50-266/82-17-07C; 50-301/82-17-07C): Combustible Control Tours

Licensee transmittal dated November 7, 1977, paragraph (A) of attachment No. 3 and paragraph (D) of attachment No. 3 states in part, "Regular plant tours by the manager-nuclear power division, operations superintendent, plant fire protection supervisor, company safety director, and shift tours by the duty shift supervisor (fire brigade chief) insure that combustibles are stored in safety related areas."

Contrary to the above, the licensee plant tours by specific plant management personnel to control the use of combustibles was found to be sporadic and no documentation to support these tours was provided. Furthermore, there was no documentation provided to verify how deficiencies once found are resolved. For further clarification, refer to example No. 5.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (4) Noncompliance (50-266/82-17-07D; 50-301/82-17-07D): Combustible Controls

Licensee transmittal dated November 7, 1977, paragraph (A) of attachment No. 3 and paragraph (C) of attachment No. 3 requires administrative control be established to minimize the amount of combustibles that a safety-related area may be exposed to. These controls should be established to govern the handling of and limitation on the use of combustibles, flammable gases and liquids, dry unused ion exchange resins or other combustible supplies in safety-related areas, and to assure that these items are not stored in safety-related areas. The licensee stated, "Specific storage areas have been assigned to the items listed. The storage of combustible materials is not allowed in safety-related areas. The licensee plant policy and practice accomplishes the requirements of removing all waste, debris, scrap, or other combustibles resulting from the work activity, in the area following completion of the activity, or at the end of each work shift, whichever is sooner."

Contrary to the above, on June 28, 1982, between the hours of 1630 and 1900, the inspectors observed combustible materials, combustible and flammable liquids, and aerosols improperly stored and left unattended after the completion of work on the normal day shift. The following are examples of this violation:

- (a) Fifty 55 gallon barrels (approximate) of synthetic dry ion exchange resin (amberlite) was stored in the spent fuel pit building elevation 44',
- (b) Unmarked (fire retardant or non-fire retardant) 40' x 60" temporary wooden structure labeled "Point Beach Hilton" has apparently been constructed for sometime due to the dust accumulation in the area, along with four rolls of fiberglass insulation with a flammable backing located in Unit 1 fascade area elevation 44'.
- (c) 300 pounds of wood planking and scaffolding material (approximate) was stored above the component cooling water heat exchanger elevation 44",
- (d) Wood planking and work benches were stored near the service elevation 52",
- (e) One dozen cans (approximate) of flammable spray paints, cleaning solvents, and combustible lubricants were stored in an unapproved cabinet in the auxiliary building elevation 26' near the motor control center No. 1842,
- (f) One piece of plywood laid on top of cable tray No. 11JJ12,
- (g) Four gallons of oil, wooden ladders, a wooden plant, and broken broom handles were scattered in the immediate location of the residual heat removal pump area elevation 19",
- (h) Wooden planking and scaffolding material, a plastic container of combustible oil, and a wooden ladder were stored in the auxiliary feedwater pump room,
- (i) Wooden stool was located under the diesel day tank in the east diesel generator room,
- (j) Wooden ladders were stored generally throughout individual safety related areas.

These violations identify a lack of concern by those personnel creating the hazards, compounded by a lack of management control over the situation. Licensee management failed to implement adequate action to insure that combustibles are not stored in safety-related areas. In addition, the licensee is not performing adequate reviews of areas selected for storage of fire hazardous materials. An example of this is the vehicles parked outside both emergency diesel generator rooms. A severe enough fire in this area has the potential to result in a common mode failure of all essential AC power.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (5) Noncompliance (50-266/82-17-07E; 50-301/82-17-07E): Work Review for Fire Hazards.

Licensee transmittal dated November 7, 1977, paragraph (B) of attachment No. 3 requires reviewing for transient fire loads during maintenance such as combustible and flammable liquids, wood and plastic products, and other combustible materials in buildings containing safety-related systems or equipment be controlled by an in-plant review of proposed work activities to identify potential transient fire loads. The licensee stated, "All maintenance requests are reviewed by the maintenance superintendent with specific review of special fire protection requirements for the maintenance activity. All work being performed by outside contractors is followed by plant maintenance group supervisors or assigned plant technical staff supervisors to insure that Point Beach Nuclear Plant Fire Protection organization procedures are adhered to."

Contrary to the above:

- (a) Maintenance requests are not presently being reviewed by the maintenance superintendent with specific review of transient fire loading protection.
- (b) All work being performed by outside contractors is not being followed up by plant maintenance group supervisors or plant technical staff supervisors to insure that the fire protection organization procedures are adhered to.
- (c) Under present licensee organization structure, a more qualified individual(s) to handle maintenance requests and any work being performed by outside contractors would be the brigade leader or assistant brigade leader.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (6) Noncompliance (50-266/82-17-07F; 50-301/82-17-07F): Hot Work Authorization.

Licensee transmittal dated November 7, 1977, paragraph 2.0(A) of attachment No. 4 requires all cutting, welding, ... work to be authorized by a responsible supervisor through a work permit. The responsible supervisor should have a basic industrial fire fighting and fire prevention course covering anticipated fires such as those found in Class A, B, and C

type hazards. The licensee stated, "A Point Beach Nuclear Plant fire brigade chief or assistant chief will authorize the issuance of an ignition source control permit".

Contrary to the above, the maintenance supervisor and primarily outside contractors are issuing the "ignition source control permits".

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (7) Noncompliance (50-266/82-17-07G; 50-301/82-17-07G): Fire Fighting Strategies.

Licensee transmittal dated November 7, 1977, paragraph (D) of attachment No. 5 and Safety Evaluation Report issued August 2, 1979, requires fire fighting procedures to identify the strategies established for fighting fires in all safety-related areas and areas presenting a hazard to safety-related equipment. The licensee states in part, "New fire fighting procedures will be developed and the Point Beach Nuclear Plant training program will be expanded to include fire fighting strategies in safety-related areas.

Contrary to the above, the licensee's fire fighting strategies were not developed with the detail specified in the requirements by failing to address each safety-related fire zone specifically as to proper fire fighting procedures to be followed.

This represents a violation of Technical Specifications 15.6.81.8 concerning the implementation of the Fire Protection Program.

- (8) Noncompliance (50-266/82-17-07H; 50-301/82-17-07H): Valve Position Control.

Safety Evaluation Report, issued August 2, 1979, paragraph 4.3.1.3, firewater piping system, and licensee transmittal dated November 1, 1976, paragraph IVC.3.(b), supervised valves, states in part, "All critical manually operated valves, that is yard main post indicator valves, fire header isolation valves, and hose station isolation valves, are provided with tamper-proof seals (tags) and are under administrative controls."

Contrary to the above, on June 30, 1982, between the hours of 1000 and 1500, the inspectors observed the diesel pump fire header isolation valve in the fire water piping system was not administratively controlled by the use of seals.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (9) Noncompliance (50-266/82-17-07I; 50-301/82-17-07I): Offsite Fire Department Drills.

Licensee transmittal dated February 1, 1978, identification No. PF-36 position No. 3 requires at least one drill per year will involve the Two Creeks Volunteer Fire Department.

Contrary to the above, none of the licensee records examined showed documentation that the once per year drill with the Two Creeks Volunteer Fire Department for 1980 ever took place.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

- (10) Noncompliance (50-266/82-17-07J; 5301/82-17-07J): Fire Brigade Training

Licensee transmittal dated February 1, 1978, identification No. 37 and No. 38 requires the licensee to perform quarterly classroom training and fire drills for each fire brigade crew. Having five crew fire brigades, a total of twenty drills would be necessary to satisfy the quarterly drill requirement.

Contrary to the above:

- (a) After reviewing crew fire brigade drill training records, Crew C has had no quarterly fire drill for the first quarter of 1982.
- (b) After reviewing crew fire brigade classroom meeting training records, none of the records showed attendance at quarterly crew classroom meetings for any of the crew fire brigades during the second quarter of 1982.

This represents a violation of Technical Specifications 15.6.8.1.8 concerning the implementation of the Fire Protection Program.

c. Discussion

Unresolved Item (50-266/82-17-08; 50-301/82-17-08): Quality Assurance Audits.

The inspector reviewed the Quality Assurance audits conducted in 1980 and 1981 (Nos. QA-80-500 and QA-81-364) concerning the Fire

Protection Program. The findings of these audits included one item and one observation in the Fire Protection Area. Considering the numerous examples of violation of Fire Protection Regulatory Requirements and Commitments cited in this report which were not identified in the audits, the inspector has two concerns:

- (1) The scope of the audits may not have included the appropriate regulatory requirements and commitments which form the basis for the facility fire protection program, and
- (2) The qualifications of the auditors may not have been at a level to permit the auditors to identify significant fire protection deficiencies.

To resolve this item, please provide to this office the results of your internal review of the Quality Assurance Audits concerning Fire Protection and corrective actions which you have taken, or will take, to broaden the scope of these audits and increase Auditor fire protection qualifications.

4. Manual Firefighting Equipment

The inspectors examined the licensee's manual fire fighting equipment including portable fire extinguishers, interior hose stations, exterior hose house equipment, brigade ready station equipment, fire brigade self contained breathing apparatus, and other equipment available for firefighting. This equipment was reviewed using the commitments and requirements in Amendments No. 39 and 44 to Licenses No. DPR-24 and DPR-27 including the Fire Protection Safety Evaluation Report issued August 2, 1979, the Point Beach Nuclear Plant Fire Protection Review issued June 20, 1977, the Plant Technical Specifications for the Fire Protection Systems, and supporting licensee transmittals.

a. Areas of Inspection

(1) Procedures

<u>Number</u>	<u>Revision Date</u>	<u>Title</u>
FOP 1.6 Minor	11/05/79	Fire extinguisher history - card file
FOI-44, Part VI-A Minor	08/28/79	Annual fire extinguisher check Annual inspection of the ansul equipment
FOP 1.5 Minor	05/24/82	Fire extinguisher identification Number and related call ups

<u>Number</u>	<u>Revision Date</u>	<u>Title</u>
TS-12 Major	07/14/81	Technical Specifications Surveillance Testing - Monthly PAB, Units 1 and 2
TS-14 Major	07/14/81	Monthly fire equipment surveillance - outside areas, maintenance and portable welding carts
OI-44 Part VI-A Minor	05/24/82	Annual fire system check - annual inspection of the ansul portable fire extinguishers

(2) Plant Tours

The inspectors examined a representative sample of manual fire fighting equipment during tours of the following plant areas:

Auxiliary Building
 Facade
 Fire Brigade Ready Station
 Plant Yard
 Turbine Building

b. Discussion

Unresolved Item (50-266/82-08-09; 50-301/82-17-09): Fire Extinguishers.

By letter dated January 13, 1978, the licensee committed to providing two 2.5 gallon pressurized water fire extinguishers inside the control room with deflector type nozzles, to increase the capability to extinguish deep seated electrical fires. A visual inspection by an inspector of these two extinguishers numbered 5-44-200 and 5-44-201, were found to have ordinary loaded stream type nozzles. In addition, these extinguishers are listed by Underwriters Laboratories as being typical 2.5 gallon pressurized water fire extinguishers for use on ordinary combustible (Class A) hazards only and are not recommended for use on energized electrical type (class C) hazards due to the shock hazard associated to the operator. Preliminary information from the extinguisher manufacturer, Ansul, on this model (Sentry-#SY-0261), and Underwriters Laboratories fire protection equipment directory, indicates that deflector type nozzles have not been manufactured by Ansul Company nor are they listed by

Underwriters Laboratories. This item will remain unresolved pending licensee review of these fire extinguishers and installation of proper fire extinguishers or verification that these extinguishers will not be used on an energized electrical equipment type fire hazard.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items or items of noncompliance. Unresolved items are contained in Paragraphs 2, 3 and 4 of this report.

6. Exit Interview

The inspectors met with the licensee representatives denoted in Paragraph 1. A preliminary exit interview was held on July 1, 1982, where the inspectors summarized the purpose and scope of the inspection and briefly discussed the findings. A final exit interview was held on July 8, 1982, where the inspectors further summarized the scope and findings of the inspection. The licensee acknowledged the findings.