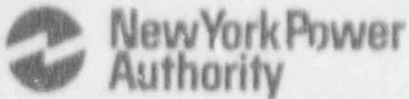


James A. FitzPatrick  
Nuclear Power Plant  
P.O. Box 41  
Lyonsville, New York 13093  
315 342-3640



Radford J. Converse  
Resident Manager

December 13, 1991

JAFP-91-0817

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

SUBJECT: DOCKET NO. 50-333  
LICENSEE EVENT REPORT: 91-024-00  
UNSATISFACTORY PENETRATION SEALS FOUND DURING  
INSPECTION

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)  
(2)(1)(B).

Questions concerning this report may be addressed to Mr.  
Russell Dowiot at (315) 349-6565.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Radford J. Converse'.

RADFORD J. CONVERSE  
RESIDENT MANAGER

RJC:RD:nrb

Enclosure

cc USNRC, Region I  
USNRC Resident Inspector  
INPO Records Center

*Handwritten notes:*  
Cut No 9542646  
IF22  
1/1

### LICENSEE EVENT REPORT (LER)

FACILITY NAME (1): **JAMES A. FITZPATRICK NUCLEAR POWER PLANT** DOCKET NUMBER (2): **0 5 0 0 0 1 3 3 3** PAGE (3): **1 OF 0 4**

TITLE (4): **(UNSATISFACTORY PENETRATION SEALS FOUND DURING INSPECTION)**

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		DOCKET NUMBER (9)
11	16	91	91	024	001	12	13	91			0 5 0 0 0
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § 1.49 (Check one or more of the following) (11): <input checked="" type="checkbox"/> (a) (b) <input type="checkbox"/> (c) <input type="checkbox"/> (d) <input type="checkbox"/> (e) <input type="checkbox"/> (f) <input type="checkbox"/> (g) <input type="checkbox"/> (h) <input type="checkbox"/> (i) <input type="checkbox"/> (j) <input type="checkbox"/> (k) <input type="checkbox"/> (l) <input type="checkbox"/> (m) <input type="checkbox"/> (n) <input type="checkbox"/> (o) <input type="checkbox"/> (p) <input type="checkbox"/> (q) <input type="checkbox"/> (r) <input type="checkbox"/> (s) <input type="checkbox"/> (t) <input type="checkbox"/> (u) <input type="checkbox"/> (v) <input type="checkbox"/> (w) <input type="checkbox"/> (x) <input type="checkbox"/> (y) <input type="checkbox"/> (z)											

OPERATING MODE (12): <b>N</b>	POWER LEVEL (13): <b>100</b>	DOCKET NUMBER (14): <b>0 5 0 0 0</b>	DOCKET NUMBER (15): <b>0 5 0 0 0</b>
-------------------------------	------------------------------	--------------------------------------	--------------------------------------

LICENSEE CONTACT FOR THIS LER (16):  
 NAME: **Russell Dowicot** TELEPHONE NUMBER: **3 1 5 3 4 9 - 6 5 6 5**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (18)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (19):  
 YES (If yes, complete EXPECTED SUBMISSION DATE)  NO  
 EXPECTED SUBMISSION DATE (19): **0 5 0 1 9 2**

ABSTRACT (Limit to 1000 words, i.e., approximately fifteen single-space typewritten lines) (20)

#### INTERIM REPORT

EIIS Codes are in [ ]

On November 16, 1991, at approximately 1730 hours while the plant was operating at 100% rated power, seven electrical penetration fire seals were discovered in unsatisfactory condition during the performance of an inspection. The inspection is currently in progress to ensure that each as-installed penetration fire seal configuration is qualified as a three hour rated fire seal by a qualification test or is analytically equivalent to a tested configuration. The inspection will also satisfy the Technical Specification required surveillance. This inspection represents an intensive effort to collect and evaluate data on all electrical and mechanical penetration fire seals. This LER is being written as an Interim Report. A supplemental LER will be issued, which addresses the safety assessments and root causes, as well as rework and repairs performed during the inspection, that will include all unsatisfactory penetration seals found. Until repairs are completed, fire watches will be stationed in accordance with Technical Specification Section 3.12.F.1.b, as required.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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   2   4	—   0   0	0   2	OF 0   4

TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC FORM 366A (17)

INTERIM REPORT

EISS Codes are in [ ]

DESCRIPTION

During normal operation, with the plant at 100% rated power, on November 16, 1991, at approximately 1730 hours, seven penetration fire seals were discovered to be unsatisfactory during the performance of an inspection. They are in electrical penetrations, having conduit or armored cables as penetrating items. They are located in the Turbine Building in the east wall of the Main Lube Oil Room. This wall has been established to meet the requirements of BTP 9.5-1, Appendix A, as a rated fire barrier.

CAUSE

Due to continued discovery of fire barrier penetration seals in a degraded condition, especially during routine inspections to satisfy the Technical Specifications 4.12.F, an inspection procedure intended to establish baseline conditions was developed.

This inspection represents an intensive effort covering all penetrations in plant fire barriers. This effort will ensure that as-installed penetration fire seal configurations can be adequately substantiated by a tested configuration or an engineering evaluation, and therefore qualified as a three hour rated fire seal. The purpose of this inspection is also to satisfy the Technical Specifications 4.12.F required surveillance.

The inspection requires the documenting of the physical configuration of each penetration fire seal and a subsequent engineering evaluation. This evaluation for qualification to a three hour seal is being documented for each penetration seal. Because of the effort required to inspect and evaluate each penetration fire seal and the total number of penetrations, both electrical and mechanical, this inspection will span several months.

It is also anticipated that a number of penetration fire seals will require repair or rework, based upon the total number of penetrations to be inspected. This LER is being written as an Interim Report until the inspection effort is completed. At the completion of the inspection, all unsatisfactory penetration fire seals will be identified and safety assessments, root causes and corrective actions taken will be reported.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

TEXT (if more space is required, use APPROX. of NRC Form 368A 2) (17)

ANALYSIS

These penetrations were found unsatisfactory and reportable because they did not represent a full three hour rated configuration, as required by the Technical Specifications. A safety assessment will be performed for these unsatisfactory penetration fire seals as a part of the inspection being performed.

The penetrations documented above were not found unsealed. They were sealed with urethane foam, for which there is no basis as a three hour fire seal. Some penetration fire seals might be discovered during the inspection in a degraded condition due to partially or completely missing damming material, or voids or cracks in the seal material. It is possible that penetrations which are discovered unsealed or penetration fire seals discovered in a degraded condition could have existed that way since the last performance of the Technical Specification required surveillance. It is also possible that due to further development of both the qualification criteria and the surveillance procedure, some of these penetration fire seals could have been unsatisfactory prior to the performance of the last required surveillance. The further developed criteria involves items as minimum seal depth, seal material condition in regards to voids and cracks, and the amount of damming material present and its condition.

CORRECTIVE ACTIONSShort-Term

1. Upon verification of the degraded condition of these penetration fire seals, the Shift Supervisor was notified immediately and a fire watch established within one hour.
2. Repair/rework actions were initiated for the deficient fire seals.

Long-Term

1. Safety assessments will be performed for all unsatisfactory penetration fire seals.
2. Root causes will be identified and corrective actions will be implemented, as required, to installation procedures and surveillance procedures in addition to any other aspects of the fire protection program.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

TEXT (if more space is required, use additional NRC Form 305A (1/77))

It should be noted that these corrective actions will be followed for all additional penetration fire seals that are discovered unsatisfactory during the inspection. Also, when damming material is removed to inspect the seal material, the workers present will act as a fire watch until the damming is re-installed as required.

The supplemental report will be issued to discuss safety significance and root causes, as well as rework and repairs required during the inspection for all unsatisfactory penetrations.

RELATED LERS:

89-007-00

89-007-01