

James A. FitzPatrick  
Nuclear Power Plant  
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August 18, 1995  
JAFF-95-0376

Harry P. Salmon, Jr.  
Site Executive Officer

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Washington, D.C. 20555

**SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Reply to Notice of Violation 95-11-01**

Gentlemen:

In accordance with the provisions of 10 CFR 2.201, Notice of Violation, the Authority submits a response to the notice transmitted by your letter dated July 21, 1995. Your letter refers to the results of the routine resident safety inspection conducted by Messrs. W. Cook and R. Fernandes from May 14, 1995 to June 24, 1995 at the James A. FitzPatrick Nuclear Power Plant.

Attachment I provides the description of the violation, reason for the violation, the corrective actions that have been taken and the results achieved, corrective actions to be taken to avoid further violations, and the date of full compliance.

Attachment II provides a summary of the commitments contained in this submittal.

If you have any questions, please contact Mr. Arthur Zaremba at (315) 349-6365.

Very truly yours,

Harry P. Salmon, Jr.  
Site Executive Officer

STATE OF NEW YORK  
COUNTY OF OSWEGO  
Subscribed and sworn to before me  
this 18<sup>th</sup> day of August, 1995

TAMMY L. CALKINS 4985563

Notary Public, State of New York

Qualified in Oswego County

~~CRIMINAL JUSTICE~~ 8/19/97  
NOTARY PUBLIC

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Attachments:

- I. Reply to a Notice of Violation
- II. Summary of Commitments

Reply to Notice of Violation 95-11-01

**Violation**

Technical Specification 6.8(A) states, in part, procedures shall be established, implemented, and maintained for the Fire Protection Program that meet or exceed the requirements and recommendations of Section 5, Facility Administrative Policies and Procedures, of ANSI 18.7-1972.

ANSI 18.7-1972, Section 5.4 states, in part, that each procedure shall be reviewed prior to initial use and periodically, thereafter, to reflect the condition of the system at that time and to provide the best possible instructions to the operators.

Contrary to the above, on May 27, 1995, Fire Protection Procedure (FPP)-3.28, Sprinkler Nozzle Air Flow Test, Revision 0, Section 8.1, was performed resulting in an unanticipated water sprinkler discharge because of inadequate procedure development and review, which failed to properly reflect the as-built configuration of the system.

This is a Severity Level IV Violation (Supplement 1).

**Admission or Denial of the Alleged Violation**

The Authority agrees with the violation as stated.

**Reasons for the Violation**

The cause of this violation was personnel error due to inadequate development and review of procedure FPP-3.28 in that the procedure did not reflect the as-built configuration of the system. A contributing factor to this event was inadequate drawings in the system operating procedure.

FPP-3.28 was a new procedure developed as part of the Authority's on-going efforts to enhance testing of plant systems. The objective of the procedure is to ensure unrestricted flow through the sprinkler nozzles on the fire suppression systems for the reactor feed pumps and hydrogen seal oil system. The test is performed by admitting service air into the spray header via the main drain line, closing an alarm control valve, opening an auxiliary drain valve, and then monitoring for air flow out of the spray nozzles. The drain line is in free communication with a pressure-operated relief valve (PORV) which functions to open and seal-in the main deluge valve when pressurized on the downstream side. Addition of the PORV was a modification made to the system in 1988 to prevent inadvertent closure of the deluge valve after system actuation.

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The test methodology of FPP-3.28 was similar to that of tests performed on the fire suppression systems for standby gas treatment, high pressure coolant injection, and reactor core isolation cooling. However, the length of piping between the air supply source and the PORV is very short; therefore, the resultant air pressure was high enough to actuate the PORV and open the main deluge valve during testing. This difference in configuration was not recognized by the procedure writer or reviewers. Additionally, the system drawings in operating procedure OP-33, Fire Protection System, were inadequate in that they did not reflect the configuration and operation of the PORV. Design documents were available which adequately reflected the system configuration and operation; however, these documents were not adequately reviewed.

Corrective Actions That Have Been Taken

- A critique of the unanticipated water sprinkler discharge event was performed in accordance with administrative procedure AP-03.03, Deviation and Event Analysis. The critique was reviewed by operations and engineering personnel responsible for the review and performance of procedures. The purpose of this review was to ensure that personnel are aware of this event, the cause, and the lessons learned.
- Performance of fire suppression system nozzle test procedures has been suspended. Each procedure will be reviewed and revised, if necessary to prevent similar events, prior to next performance.
- The drawings in operating procedure OP-33 have been revised to reflect the configuration and operation of the PORV.
- This event was reviewed at the Performance Enhancement Review Committee (PERC) by senior management. The following additional corrective actions were taken as a result of PERC review:
  - An evaluation was performed of the drip proof integrity of enclosures inside the reactor feed pump room. Results indicate that sealing of equipment is adequate.
  - The process for selection and certification of procedure reviewers was evaluated. The results indicate that the process is adequate and that the inadequate development and review of FPP-3.28 was the result of poor work practices by the procedure author and reviewers rather than inadequate qualification of personnel.

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**Results Achieved**

Operations and engineering personnel responsible for procedure review and performance have been familiarized with the details of this event, the potential for unanticipated system responses when conducting new tests or evolutions, and the need to consider not just the mechanics of a procedure but the potential for adverse consequences during procedure performance.

**Corrective Actions to be Taken**

- Senior management will meet with all qualified procedure reviewers. Purpose of the meeting will be to reinforce management expectations regarding the thoroughness of reviews, procedure review philosophy, and reviewer responsibilities. (Planned Completion Date: August 29, 1995)
- A sample of previous modification closeout documents will be reviewed to ensure necessary drawings have been updated. (Planned Completion Date: September 15, 1995)
- Procedure FPP-3.28 will be revised to require the header isolation valve for the fire suppression system be closed during the nozzle test to prevent inadvertent actuation of water spray. (Planned Completion Date: September 29, 1995)
- Fire suppression system test procedures will be reviewed to determine if a similar type event is possible during testing. Procedures will be revised as required. (Planned Completion Date: December 31, 1995)

**Date When Full Compliance will be Achieved**

Full compliance will be achieved upon completion of the remaining corrective actions by December 31, 1995.

## Attachment II to JAFP-95-0376

## Summary of Commitments

Number	Commitment	Due Date
JAFP-95-0376-01	Senior management will meet with all qualified procedure reviewers. Purpose of the meeting will be to reinforce management expectations regarding the thoroughness of reviews, procedure review philosophy, and reviewer responsibilities.	8/29/95
JAFP-95-0376-02	A sample of previous modification closeout documents will be reviewed to ensure necessary drawings have been updated.	9/15/95
JAFP-95-0376-03	Procedure FPP-3.28 will be revised to require the header isolation valve for the fire suppression system be closed during the nozzle test to prevent inadvertent actuation of water spray.	9/29/95
JAFP-95-0376-04	Fire suppression system test procedures will be reviewed to determine if a similar type event is possible during testing. Procedures will be revised as required.	12/31/95