

Ralph E. Beedle
Executive Vice President
Nuclear Generation

January 30, 1992
JPN-92-006

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
**Special Report Regarding Fire
Barrier Penetration Seal Failure**

- REFERENCES:
1. NRC letter, J.A. Calvo to R.E. Beedle, dated December 19, 1991 (JAF-91-394), "Temporary Waiver of Compliance Regarding Fire Barrier Penetration Seals"
 2. NYPA letter, R.E. Beedle to NRC, dated December 12, 1991 (JPN-91-069), "Onetime Extension of Fire Barrier Penetration Surveillance Interval"

Dear Sir:

The NRC staff recently granted the Authority a Waiver of Compliance (Reference 1) that permitted the use of roving fire patrols to monitor non-functional fire barrier penetration seals. One provision of this waiver requires the submittal of a Special Report to the NRC when a non-functional fire barrier penetration seal can not be restored to functional status within 7 days. The Special Report is required to outline the action taken, cause of the non-functional penetration, and the plans and schedules for restoring the fire barrier penetration seal to functional status. Attachment I, which was submitted to the NRC on December 13, 1991, fulfills this reporting requirement.

The Authority previously submitted Attachment I as LER 91-024-00. As outlined in the LER, a supplemental LER will be issued to address the safety significance and root causes, as well as rework and repairs performed during the inspection. The supplemental LER will be submitted after the baseline inspection program has been completed and will address all unsatisfactory penetration seals found. The Authority has filed an application to extend the fire barrier penetration surveillance interval (Reference 2) until May 15, 1992. This application is still under review by the NRC staff.

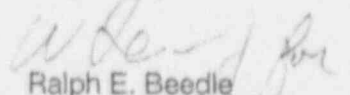
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Should you or your staff have any questions, please contact Mr. J. A. Gray, Jr.

Very truly yours,


Ralph E. Beedle
Executive Vice President
Nuclear Generation

att: as stated

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Office of the Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 136
Lycoming, NY 13093

Mr. Brian C. McCabe
Project Directorate I-1
Division of Reactor Projects - I/II
U. S. Nuclear Regulatory Commission
Mail Stop 14 B2
Washington, DC 20555

Ms. Donna Ross
New York State Energy Office
2 Empire State Plaza
16th Floor
Albany, NY 12233

ATTACHMENT I to JPN-92-006

**SPECIAL REPORT REGARDING FIRE
BARRIER PENETRATION SEA: FAILURE**

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Docket No. 50-333

DPR-59

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



Radford J. Converse
Resident Manager

December 13, 1991

JAFP-91-0617

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)(i)(B).

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

Very truly yours,

RADFORD J. CONVERSE
RESIDENT MANAGER

RJC:RD:nrb

Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center

~~91-21705-35-5PP~~

LICENSE EVENT REPORT (LER)

FACILITY NAME (1) **JAMES A. FITZPATRICK NUCLEAR POWER PLANT** DOCKET NUMBER (2) **0 8 0 0 0 3 3 3** PAGE (3) **1 OF 6 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 8 0 0 0
											0 8 0 0 0

OPERATING MODE (10) **N** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following (11))

POWER LEVEL (12) 100	BLISS (13)	20.400a(1)	20.70a(21a)	20.71a(1)
	20.400a(1)(b)	20.20a(1)	20.70a(21b)	20.71a(2)
	20.400a(1)(c)	20.20a(2)	20.70a(21c)	20.71a(3)
	20.400a(1)(d)	20.70a(21a)	20.70a(21d)	20.71a(4)
	20.400a(1)(e)	20.70a(21b)	20.70a(21e)	20.71a(5)
	20.400a(1)(f)	20.70a(21c)	20.70a(21f)	20.71a(6)
	20.400a(1)(g)	20.70a(21d)	20.70a(21g)	20.71a(7)
	20.400a(1)(h)	20.70a(21e)	20.70a(21h)	20.71a(8)
	20.400a(1)(i)	20.70a(21f)	20.70a(21i)	20.71a(9)
	20.400a(1)(j)	20.70a(21g)	20.70a(21j)	20.71a(10)

OTHER (Specify in Abstract above and in Part 3 of Form NSR-890)

LICENSER CONTACT FOR THIS LER (14) NAME **Russell Dowiet** TELEPHONE NUMBER **315 349-6565**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (15)

CAUSE	SYSTEM	COMPONENT	MANUFAC. TURB	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFAC. TURB	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (16) YES (If so, complete EXPECTED SUBMISSION DATE) NO EXPECTED SUBMISSION DATE (18) MONTH **05** DAY **01** YEAR **92**

ABSTRACT (Limit to 1000 words, i.e., approximately 10 lines single-spaced typewritten text) (19)

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 (3)			PAGE (3) 9 1 - 0 2 4 - 0 0 0 2 OF 0 4
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	

TEXT (if more space is required, use additional NRC Form 2064 (1))

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 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3) 0 3 OF 6 4
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TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC FORM 3054 (9-83)

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 ACTIONS

Short-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) JAMES A. FITZPATRICK NUCLEAR POWER PLANT	DOCKET NUMBER (2) 0 15 0 0 0 3 3 3	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 1	0 2 4	0 0	0 4	OF 0 4

TEXT: If more space is required, use additional NRC Form 266A (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