James A. FitzPatrick Nuclear Power Plant P.O. Box 41 Lycoming, New York 13093 1 315 342-3840



Radford J. Converse Resident Manager

March 23, 1992 JAFP-92-0254

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

SUBJECT: Docket No. 50-333

Licensee Event Report: 92-011-00 - Fire Door and Spray Curtain Obstructed

By Scaffold

Dear Sir:

This letter is submitted in accordance with 10CFR50.73 (a)(2)(ii)(B).

If you have any questions, please contact Mr. J. Fitzgerald at (315)349-6941.

Very truly yours,

RADFORD J. CONVERSE

RJC/JF/mam

Enclosure

CC: USNRC, Region I

USNRC Resident Inspector

INPO Records Center

Cert # 196 449

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While the plant was shutdown and in a cold condition for maintenance and refueling, two separate instances of fire protection equipment being obstructed by scaffolding occurred on February 21, 1992 and March 3, 1992. In one case a fire door closing path was blocked. In the other case a fire curtain spray pattern was partially blocked. In each instance, the fire protection equipment would have been prevented from performing its design function in the event of a fire. These instances were caused by insufficient attention to detail by supervision and failure to adequately instruct craft workers. Supervisors and craft foremen have been retrained on the requirements for erection of scaffolds near safety related equipment. Particular emphasis was placed on initial walkdown by supervision and detailed instruction to the craft workers. LER 85-004 describes a similar event.

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Description

With the plant in the cold condition and undergoing routine maintenance and refueling, fire protection equipment was obstructed by scaffolding on two separate occasions. In both instances the fire protection equipment would not have performed its design function in the event of a fire.

On February 21, 1992 a scaffold structure was being erected in the passageway on the 272 foot elevation, south side of the Reactor Building [NG]. The scaffold components were part of the framework of an enclosure to prevent the spread of concrete dust which would result from the removal of a concrete block wall. The wall was to be removed to allow the replacement of Residual Heat Removal/Low Pressure Coolant Injection (RHR/LPCI) [BO] shutdown cooling suction valve 10MOV-17.

Scaffold components were erected in the path of fire door 76FDR-R-272-27 and would have prevented the door from fully closing.

Fire door 76FDR-R-272-27 is suspended from above by a track and roller arrangement. The track extends from the south wall of the Reactor Building 272 foot elevation appro-imately two-thirds of the way across the East-West passageway. hen open, the fire door is situated adjacent to and parallel with a concrete wall. When the door closes, it travels north approximately 6 feet 4 inches and comes to rest in brackets attached to a column. The column is located approximately 4 feet 1 inch from the north wall of the passageway.

Since Fire Door 76FDR-R-272-27 is not obvious when opened and does not completely block the passageway when closed, the craft workmen who erected the scaffold were not aware of existence of the door. The job supervisor was aware of the fire door but assumed that the craft workers knew it was there. The supervisor did not alert the craft workers to the presence of the fire door and the necessity to maintain its closing path free of obstruction.

An operator observed that the fire door was obstructed and notified the Shift Supervisor. The Shift Supervisor stationed a continuous fire watch at the door within one hour in accordance with Technical Specification 3.12.F. Construction Services was notified and immediately removed the scaffold components which were obstructing the door.

Fire door 76FDR-R-272-27 was obstructed for approximately 30 minutes.

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 On March 3, 1992 a scaffold was erected on the 300 foot elevation, west side of the Reactor Building. The scaffold was to be used for fire barrier penetration seal inspection and, if necessary, repair.

The scaffold was located directly under the east end of Fire Curtain #3 [KP]. The horizontal scaffold planks partially obstructed the flow pattern from the fire curtain sprinkler heads. The fire curtain sprinkler heads are configured inside a sheet metal heat collector-baffle arrangement in the overhead of Reactor Building 300 foot elevation. Because of the sheet metal baffle, piping and equipment in the area, the fire curtain nozzles are not readily visible from the floor.

Neither the job supervisor nor the craft workers who erected the scaffold were aware of the existence of the fire curtain sprinklers. The scaffold was inspected by a Technical Services Engineer for adequate seismic constraint. He did not notice that the spray pattern was partially obstructed. The scaffold had also been inspected by an operator for operability.

On March 9, 1992 at 0946 while inspecting another scaffold, an operator observed that the scaffold planks would interfere with the spray pattern of Fire Curtain #3. He notified the Shift Supervisor who in turn notified the Fire Protection Supervisor and Construction Services. Construction Services removed the scaffold planks which interfered with the spray pattern.

Fire Curtain #3 spray pattern was partially obstructed for approximately two days.

Cause

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In each instance supervision failed to adequately instruct the craft workmen of the job requirements. In the case of Fire Door 76FDR-R-272-27 being obstructed, the supervisor recognized the existence of the fire door but did not ensure that the craft workers knew that the closing pat should not be obstructed. In the case of the Fire Curtain #3 spray pattern obstruction, the supervisor did not adequately walk the job down, did not see the fire curtain sprinklers. Therefore, the supervisor did not instruct the craft workers of requirements to leave the spray path unobstructed.

Analysis

Neither of the two events resulted in significant safety concerns by themselves due to the existence of operable automatic fire detection and suppression equipment in the area, and/or low combustible loading in the area of concern.

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The potential for more serious instances of scaffolding interfering with installed plant equipment due to insufficient attention to detail by supervision and fail re to adequately instruct craft workers is potentially the most significant aspect of these events.

The obstruction of fire door 76FDR-R-272-27 and the obstruction of Fire Curtain #3 are events reportable under 10CFR50.73(a)(2)(ii)(B). That is, the impairment of the fire protection features installed to meet the requirements of NRC Branch Technical Position 9.5-1, Appendix A or 10CFR50, Appendix R resulted in conditions that were outside of the design basis of the plant.

Corrective Action

1. Supervisor and craft foremen who are involved with the erection of scaffolding have been retrained on the requirements of Plant Standing Order 51, "Erection of Scaffolds Near Safety Related Equipment." Particular emphasis was placed on thorough inspection of the work site for potential interferences prior to and subsequent to scaffold erection. Supervisors and foremen were counseled on the requirement to provide detailed instructions to the craft workers and to point out the underlying reason for the job requirements. Completed on March 19, 1992.

Additional Information

Failed Components: None

Similar Events: LER-85-004 describes a similar event during which scaffolding interfered with safety related equipment.