

Ralph E. Beedle

March 27, 1992  
JPN-92-014

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Fire Protection Program

- REFERENCES:
1. NYPA letter, R. E. Beedle to the NRC, dated August 16, 1991 (JPN-91-043), regarding a schedule for the short term fire protection actions.
  2. NYPA letter, R. E. Beedle to the NRC, dated September 13, 1991 (JPN-91-050), regarding a schedule for the long term fire protection actions.

Dear Sir:

The Authority has been conducting an extensive review of the Fire Protection Program at the FitzPatrick plant. As a result of this ongoing effort, the Authority has identified deficiencies in the program. Recently the NRC conducted a Special Team Inspection (92-80) of the FitzPatrick Fire Protection Program. During the exit meeting on March 20, 1992, the NRC identified sixteen open items. This letter briefly summarizes the Authority's actions to resolve these open items.

The Authority will complete significant fire protection programmatic improvements, including a root cause analysis, prior to startup from the current refueling outage. Specifically, any modifications or program improvements necessary to assure that the plant can be safely shutdown in the event of a fire will be completed prior to startup. The material condition of the plant will be improved to reduce the probability of a fire. The deficiencies in the fire brigade equipment, training and procedures will be corrected.

Work on these improvements has already started. To improve the physical condition of the plant, all work was stopped until unnecessary transient combustibles were removed from the plant. Hot process fire watch personnel and station fire watch personnel are being retrained. A new Safe/Alternative Shutdown Analysis is being completed. The draft analysis and its recommendations were discussed with the NRC inspection team.

9204680190 920327  
PDR ADDCK 05000333  
PDR

670108

CHANGE ORIG TO  
RGN 1


A006  
111

All the elements of the FitzPatrick Fire Protection Program have not been finalized. Specifically, issues identified by the new Safe/Alternative Shutdown Analysis are being evaluated by Engineering and resolutions are being developed. Technically justifiable interim compensatory measures may be developed for some of the issues and implemented for modifications requiring long lead times. A description of the issue and the associated compensatory measures will be submitted to the NRC for review.

Attachment 1 is the Authority's schedule for resolving the sixteen open items discussed at the exit meeting. In addition, the Authority will provide a comprehensive plan and schedule to address fire protection issues by April 15, 1992. The plan will include the above sixteen open items; the long term and short term actions discussed in References 1 and 2; and a schedule for the completion of each issue.

If you have any questions, please contact Mr. J. A. Gray, Jr.

Very truly yours,

  
Ralph E. Beedle  
Executive Vice President  
Nuclear Generation

cc:

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

Office of the Resident Inspector  
U. S. Nuclear Regulatory Commission  
PO 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

ATTACHMENT 1 TO JPN-92-014

(page 1 of 6)

**SCHEDULE FOR COMPLETION OF THE SIXTEEN OPEN ITEMS  
DISCUSSED AT THE EXIT MEETING FOR THE NRC SPECIAL INSPECTION  
(92-80) ON THE FITZPATRICK FIRE PROTECTION PROGRAM**

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>SCHEDULE</u>
1	This item consists of the following:	
a)	No high impedance fault analysis [NYPA identified item]	Note 1
b)	Lack of guidance to operators in fire response procedures to achieve a safe shutdown and to assist with diagnosis of significant spurious actuations of equipment [Discussed in DET Section 2.3.2.8 (3)]	To be resolved and corrective actions to be implemented prior to startup.
c)	Failure to include spurious actuation vulnerabilities in fire response procedures for communications and indication circuitry [NYPA identified item; discussed in DET Section 2.3.2.8 (6)]	To be resolved and corrective actions to be implemented prior to startup.
d)	Lack of original or subsequent verification of illumination levels of lighting [Discussed in DET Section 2.3.2.8 (7)]	To be resolved and corrective actions to be implemented prior to startup.
e)	Unreviewed potential common mode failures of electrical cables due to lack of separation [Discussed in DET Section 2.3.2.8 (9)]	Note 1

ATTACHMENT 1 TO JPN-92-014

(page 2 of 6)

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>SCHEDULE</u>
2	This item consists of the following:	
a)	Assignment of only one individual part time to walk down the plant for transient combustibles and evaluate the condition of the fire protection system [Discussed in DET Section 2.3.2.8 (4)]	Additional personnel will be assigned prior to startup.
b)	Lack of a design basis document for fire protection [NYPA identified item; discussed in DET Section 2.3.2.8 (5)]	See Reference 2.
c)	No procedures governing fire watches [Discussed in DET Section 2.3.2.8 (8)]	Additional procedures will be developed and implemented prior to startup.
d)	Uncontrolled storage of flammables in safety-related equipment rooms [Discussed in DET Section 2.3.2.8 (10)]	Appropriate controls will be developed and implemented prior to startup.
3	Short and long term fire protection action lists	See References 1 and 2.

ATTACHMENT 1 TO JPN-92-014

(page 3 of 6)

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>SCHEDULE</u>
4	Corrective actions for the 43 items presently identified by the new Safe/Alternative Shutdown Analysis	A schedule will be provided by April 15, 1991. Also see Note 3.
5	Use of ADS/LPCI shutdown methodology in the new Safe/Alternative Shutdown Analysis	A decision on the methodology to be used will be provided by April 3, 1992.
6	Validity of present shutdown methodology due to the different systems used to achieve safe shutdown in the old Safe/Alternative Shutdown Analysis and the new Safe/Alternative Shutdown Analysis [ 10 CFR 50. Appendix R, III.G ]	See schedule for item 4.
7	In walking down AOP-43, the labeling and lighting was inadequate	To be resolved and corrective actions to be implemented prior to startup.
8	Configuration of the one-hour fire barriers	Note 3
9	Inadequacies in the suppression and detection systems, especially the design basis of the carbon dioxide system (i.e., sensors not installed at ceiling, system not designed to NFPA 72E, etc.)	Note 2

ATTACHMENT 1 TO JPN-92-014

(page 4 of 6)

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>SCHEDULE</u>
10	No periodic testing of the safe shutdown panels	Revise procedures and complete surveillance tests prior to startup.
11	Operators require walkthrough training of the AOP-43 at least twice a year	Training schedules will be implemented and operator an walkthrough will be conducted prior to startup.
12	Establish the basis for the two hours allowed after a fire to begin the implementation of AOP-52	Information that was provided to the NRC during the inspection is presently under NRC review. No further information is required from the Authority at this time.

ATTACHMENT 1 TO JPN-92-014

(page 5 of 6)

<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>SCHEDULE</u>
13	Inadequate emergency lighting due to physical problems (i.e., poor or no illumination, aimed incorrectly, inadequate mountings, etc.) [10 CFR 50, Appendix R, III.J]	To be resolved and corrective actions to be implemented prior to startup.
14	Inadequate emergency lighting due to failure to include manufacturer recommendations in the maintenance and surveillance procedures [10 CFR 50, Appendix R, III.J]	Revise procedures and complete surveillance tests prior to startup.
15	Inadequacies in the Fire Protection Program including Fire Plans, no qualified personnel to issue burn permits, control of combustibles, weakness in ignition source control, weakness in fire watch training, weakness in fire brigade training, little hands-on training (i.e., actual fires, equipment use, etc.), inadequate pre-fire plans, outdated equipment, etc. [Amendment 47 of the FitzPatrick Operating License]	Weaknesses and inadequacies to be resolved and corrective actions to be implemented prior to startup.
16	Failure to take adequate corrective actions on the findings from the QA audits of the Fire Protection Program [10 CFR 50, Appendix B]	Note 4

NOTES:

1. This information is included in the new Safe/Alternative Shutdown Analysis.

ATTACHMENT 1 TO JPN-92-014  
(page 6 of 6)

NOTES:  
(cont'd)

2. The following actions will be completed prior to startup:
- a) Install a Battery Room Corridor Suppression System;
  - b) Install a Fire Detection System north of the Electric Bay; and
  - c) Evaluate the adequacy of the Automatic Fire Suppression and Detection Systems required to support Appendix R and implement compensatory actions as required.

In addition, the following actions will be completed after startup:

- a) Perform an NFPA Code review and compile the design basis for existing Fire Suppression and Detection Systems and complete the NFPA Code review one year after startup;
  - b) Evaluate, justify or modify the systems as required. Complete the evaluations, justifications, and/or modifications one year after the completion of the NFPA Code review; and
  - c) Implement required compensatory actions prior to any required modifications.
3. Although the Authority will make every reasonable effort to complete these items prior to startup, these items must be evaluated by Engineering before the most effective solution or modification can be identified. Technically justifiable interim compensatory measures may be developed and implemented for modifications requiring long lead times. A description of the issue and the associated compensatory measures will be submitted to the NRC for review.
4. The QA findings are being reviewed. This action will be completed prior to startup. Training and procedural changes recommended by the review will be implemented prior to startup. Modifications recommended by the review will be completed as discussed in Note 3.