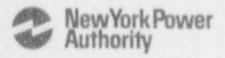
James A. FitzPatrick Nuclear Power Plant P.O. Box 41 Lycoming, New York 13093 315 342-3840



June 26, 1992 JAFP-92-0499

Harry P. Salmon, Jr. Resident Manager

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

SUBJECT: DOCKET NO. 50-333

LICENSEE EVENT REPORT: 92-029-00 - Failure to Submit Required 30-Day Special Report

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i) and (v). This report is also submitted as a special report required by Technical Specification 3.12.C.2 and 6.9.B.2.

Questions concerning this report may be addressed to Mr. Verne Childs at (315) 394 . . 071.

Very truly yours,

HPS: WCM: WVC: dmh

HARRY

CC: USNRC, Region I

SALMON

USNRC Resident Inspector

INPO Records Center

RMS (Site)

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Centro Po64705494

APPROVED OMB NO 3150-0104 EXPIRES A/30-32

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LICENSEE EVENT REPORT (LER)

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W. Verne Ch	ilds, Senior Ll	censing Engineer	AREA COD						
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The plant was shutdown and in the cold condition for maintenance and refuel.

On January 27, 1992, three Carbon Dioxide Fire Suppression Dampers for the North Emergency Diesel Generator [EK] Switchgear Room were tagged out of service to allow modification work. A fire watch was posted per the requirements of Technical Specification 3.12.C.2. Following completion of the modification work, these dampers were returned to service on April 20, 1992. A 30-day Special Report as required by Technical Spec'fication 3.12.C.2 and 6.9.B.2 was not submitted. The failure to track the requirement resulted in the failure to submit the special report. Procedure changes will be implemented to reduce the probability of recurrence.

NRC FORM 386A

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED DMB NO. 3150-0104 EXPIRES 4/30/92

TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION, COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20558, AND TO THE PAPERWORK REDULCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503.

FACILITY NAME (1)		DOCKET NUMBER (2)						-	LER NUMBER (8)									PAGE (3)					
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TEXT If more space is required, use additional NRC Form 366A's) (17)

Description

EIIS Codes are in []

The plant was shutdown and in the cold condition for maintenance and refuel.

On January 27, 1992, Carbon Dioxide Fire Suppression System Dampers 92CD-2, 92CD-4, and 67CD-1 were tagged out of service to perform work under Modification M1-88-039. This modification work was to correct damper deficiencies discussed in LER-91-010. The effect of the tagging was to render the Carbon Dioxide Fire Suppression [KQ] to the North Emergency Diesel Generator (EK) Switchgear Room inoperable. These dampers were not returned to service until April 20, 1992.

Technical Specification 3.12.C.2 and 6.9.B.2 require that the Carbon Dioxid: Fire Suppression System be returned to operable within 14 days or a Special Report be submitted to the Commission within 30 days. The dampers were not returned to service until 84 days after being removed from service and the Special Report was not submitted.

Cause

The failure to track the Limiting Condition for Operation resulted in the failure to identify the requirement to submit a 30-day Special Report.

Analysis

The Carbon Dioxide Fire Suppression System dampers (92CD-2, 92CD-4, and 67CD-1) are designed to close on the initiation of the Carbon Dioxide Fire Suppression System. The Modification package correctly indicated that the associated Emergency Diesel Generators (EDGs) would be inoperable while the work was in progress, and appropriate actions were taken to ensure the work was done during a period when the respective EDGs were not required. A fire watch was posted as required. Therefore, this event had no safety significance.

The failure to submit the Special Report requires a report under 10 CFR 50.73 (a) (2) (i) (B) as an operation published by plant Technical Specifications. That is, Technical Specification 3.12.2.2 was not met for a period of approximately two months.

NRC FORM 386A (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED DMB NO 3150-0104 EXPIRES 4/30/92

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AUF. REPORTS MANAGEMENT BRANCH (F-830), U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555, AND TO THE FAPERWORK BEDUCTION PROJECT (3155-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)		DGCKET NUMBER (2)								LEA NUMBER (6)									PAGE (3)				
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Corrective Action

- The immediate corrective action was to submit this LER and the required 30-day Special Report as a part of this LER.
- Operations Department Standing Order (ODSO-34) for logging and tracking Limiting Conditions for Operation has been written and was approved on June 13, 1992
- 3. All Shift Supervisors, Assistant Shift Supervisors, and Shift Technical Advisors will receive training on the procedure, and the need to identify all Limiting Conditions for Operation required actions, and insure they are completed within the allowed time stated in the Limiting Conditions for Operation. To be completed by July 10, 1992.

Additional Information

Failed Components: None

Similar Events: No previous LERs have been submitted due to

failing to submit a 30-day Special Report.

Special Report Information

The Modification work was completed, and the North Emergency Diesel Generator Switchgear Room Carbon Dioxide Fire Suppression System dampers (92CD-2, 92CD-4, and 67CD-1) were returned to service on April 20, 1992. The Carbon Dioxide Fire Suppression System was inoperable for a period of 84 days. The 30-Day Special Report as required by Technical Specification 3.12.C.2 and 6.9.B.2 was not submitted.