

LICENSEE EVENT REPORT (LER)

APPROVED OMS NO. 3180 0104  
EXPIRES: 8/31/85

FACILITY NAME (1) Limerick Generating Station - Unit 1		DOCKET NUMBER (2) 050003521	PAGE (3) 1 OF 013
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TITLE (4)  
Failure to Establish Fire Watches

EVENT DATE (8)			LER NUMBER (9)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (6)			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER (5)	
0	12	18	5	85	0115	0	0	30	6	8	5	050003521

OPERATING MODE (10) 2

POWER LEVEL (11) 0.04

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

<input type="checkbox"/> 20.402(a)	<input type="checkbox"/> 20.406(a)	<input type="checkbox"/> 80.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.408(a)(1)(i)	<input type="checkbox"/> 80.38(a)(1)	<input type="checkbox"/> 80.73(a)(2)(v)	<input type="checkbox"/> 73.71(a)
<input type="checkbox"/> 20.408(a)(1)(ii)	<input type="checkbox"/> 80.38(a)(2)	<input type="checkbox"/> 80.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.408(a)(1)(iii)	<input checked="" type="checkbox"/> 80.73(a)(2)(ii)	<input type="checkbox"/> 80.73(a)(2)(vii)(A)	
<input type="checkbox"/> 20.408(a)(1)(iv)	<input type="checkbox"/> 80.73(a)(2)(iii)	<input type="checkbox"/> 80.73(a)(2)(vii)(B)	
<input type="checkbox"/> 20.408(a)(1)(v)	<input type="checkbox"/> 80.73(a)(2)(iv)	<input type="checkbox"/> 80.73(a)(2)(ii)(a)	

LICENSEE CONTACT FOR THIS LER (12)

NAME John C. Nagle, Engineer	TELEPHONE NUMBER AREA CODE 215 841-5184
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)

NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Abstract: 85-015

On January 18, 1985, with Unit 1 in the startup mode at 3.6 percent power, while performing an inspection of the fire suppression system, it was discovered that the sprinkler system for the Cable Spreading Room was out-of-service. Subsequently, the sprinkler system for the Control Enclosure Fan Room was also found out-of-service. Both systems were immediately returned to service. Since both sprinkler systems were out-of-service without a continuous fire watch, this event is a violation of Technical Specification 3.7.6.2. Investigation of the event revealed that contractor personnel working on the blocked portion of the system performed a modification hydrostatic test and closed the two supply valves for these systems without properly notifying operating personnel. Following completion of the modification, operating personnel cleared the block without performing adequate operational verification.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Limerick Generating Station Unit 1	DOCKET NUMBER (2)  0   5   0   0   0   3   5   2	LER NUMBER (5)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		85	0   1   5	0   0	0   2	OF	0   3

TEXT (if more space is required, use additional NRC Form 360a (1))

Description of the Event:

On January 8, 1985, portions of the water fire protection system in the Control Enclosure were tagged out-of-service for modification work. This modification involved the transfer of the supply piping for certain hose stations from one supply line to another. Appropriate fire watches and back-up suppression equipment were provided as required by the Technical Specifications for the hose stations and sprinkler systems rendered inoperable.

For a hydrostatic test, contractor personnel closed valves 22-1155 and 22-1156 for the Cable Spreading Room sprinkler system and the Control Enclosure Fan Room sprinkler system, respectively. Closure of these valves without notifying operating personnel was permitted by job rule. The hydrostatic test was completed and the blocking removed on January 10, 1985. The Maintenance Request Form (MRP) for the modification was closed on January 11, 1985, and the fire watches terminated.

On January 18, 1985, while performing an inspection of the fire systems, contractor personnel discovered that valve 22-1155 was closed and, therefore, the sprinkler system for the Cable Spreading Room was inoperable. Subsequently, valve 22-1156 for the Control Enclosure Fan Room sprinkler system was also discovered to be closed. The sprinkler systems were immediately returned to service. The absence of a continuous fire watch during the period these systems were out-of-service was a violation of Technical Specification 3.7.6.2.

Investigation into the event revealed that the closed valves were located inside the scope of equipment controlled by the tag-out for the modification. In addition, operating personnel preparing the operation verification form were unaware of the fact that the job rule for hydrostatic testing permitted closure of valves. The Administrative Procedure for the removal of systems from service and restoration of these systems (Procedure A-41) describes the controls which apply to safety related systems but does not describe actions to be taken for restoration of non-safety related systems required to be operable by the Technical Specifications. As a result, no operability verification was specified or performed.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Limerick Generating Station Unit 1	DOCKET NUMBER (2) 0   5   0   0   0   3   5   2   8   5   -   0   1   1   5   -   0   1   0   0   3   OF   0   1   3	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

TEXT (if more space is required, use additional NRC Form 366a (1))

Consequences of the Event:

The sprinkler systems of the Cable Spreading Room (Elevation 254) and the Control Enclosure Fan Room (Elevation 304) were out-of-service between January 10, 1985 and January 19, 1985 without a continuous fire watch being established. However, early warning of a fire would have been accomplished by operable smoke detectors. A manually initiated total flooding carbon dioxide system also provided additional fire protection for the Cable Spreading Room.

Cause of the Event:

This event was the result of an inadequate procedure for the performance of hydrostatic testing during the operations phase; and personnel error resulting from an inadequate procedure for restoration of plant systems and components.

Corrective Actions:

The immediate corrective action taken in response to the event was to restore the inoperable systems to service. Short term corrective action was to instruct contractor supervision and craft personnel that equipment within the confines of an equipment tag-out must only be operated by PECO operating personnel or involve specific notification and approval from operating personnel.

Interim corrective action involved the generation and issuance of a new procedure, which controls the pressure testing of plant components and prohibits operation of valves by craft personnel. This procedure was issued on February 22, 1985.

Additionally, the generic long term corrective action involves the revision of administrative procedure for control of plant equipment to apply the removal/restoration controls which presently apply to safety related equipment to equipment which is required to be operable by the Technical Specifications but is not classified as safety-related. This procedure is presently expected to be PORC approved by March 15, 1985.

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

March 6, 1985

Docket No. 50-352

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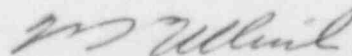
SUBJECT: Licensee Event Report  
Limerick Generating Station - Unit 1

This Licensee Event Report concerns failure to establish fire watches in accordance with Technical Specification 3.7.6.2.

Reference: Docket No. 50-352  
Report Number: 85-015  
Revision Number: 00  
Event Date: January 21, 1985  
Report Date: March 6, 1985  
Facility: Limerick Generating Station  
P.O. Box A, Sanatoga, PA 19464

This LER is submitted pursuant to the requirements of 10CFR50.73 (a)(2)(i). We regret the late submission date of the LER. The delay in the reporting of this LER was the result of our desire to provide completion dates of the long term corrective actions taken by Philadelphia Electric Company in response to this event.

Very truly yours,



W. T. Ullrich  
Superintendent  
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC  
J. T. Wiggins, Senior Site Inspector  
See Service List

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cc: Judge Helen F. Hoyt  
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Timothy R. S. Campbell

January 16, 1985