

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

Radford J. Converse  
Resident Manager



September 20, 1985  
JAFF 85-0765

U.S. Nuclear Regulatory Commission  
Region I  
531 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Mr. Stewart Ebnetter, Director  
Division of Reactor Safety

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
NRC Region I Inspection Report  
Number 50-333/85-20

Attachment: 1) Plans and Schedules for the Resolution of  
Open Items Associated with Inspection No.  
85-20 (Fire Protection)

Dear Sir:

In accordance with the provisions of Appendix C to 10 CFR 2, the Authority is submitting its response to Appendix A - Notice of Violation transmitted by your letter dated August 21, 1985, received by the undersigned August 26, 1985. This Notice of Violation concerns the inspection conducted by Mr. A.G. Krasopoulos of your office on June 17 through 21, 1985, at the James A. FitzPatrick Nuclear Power Plant to assess the safe shutdown capability of the plant in the event of a fire.

NOTICE OF VIOLATION SUMMARY

10 CFR 50 Appendix R, Section III G.2 requires that redundant safe shutdown systems and associated non-safety circuits that could prevent operation or cause maloperation of the safe shutdown systems, shall be separated by either a fire barrier having a 3 hour rating or shall be separated by a horizontal distance of 20 feet with no intervening combustibles with area suppression and detection or shall be separated by enclosing one of the systems within a one hour barrier with area suppression and detection.

Contrary to the above on June 17, 1985, fire barriers in the Control Room and Relay Room were found to contain penetrations with non-rated seals. Also redundant cables and conduits that could impact safe shutdown were located within the same fire areas (East and West Cable Tunnels) U.S. Nuclear Regulatory Commission without the proper separation.

8510010340 850920  
PDR ADOCK 05000333  
Q PDR

1E 01

U.S. Nuclear Regulatory Commission  
Attention: Mr. Stewart D. Ebnetter  
SUBJECT: JAFNPP  
DOCKET NO. 50-333  
NRC REGION I INSPECTION REPORT  
NUMBER 50-333/85-20

September 20, 1985  
JAFP 85-0765  
Page -2-

Power cable No. 1H0EBBH001 associated with the B train was located in the same fire area with cables associated with train A in the west tunnel. Also, conduits No. 1CC208NA6, 1CC230RD1, 1CC767NQ and 1CK025F associated with train A were located in the East tunnel with conduits associated with train B.

RESPONSE TO NOTICE OF VIOLATION

The Power Authority agrees with these findings.

IMMEDIATE CORRECTIVE ACTION;

Fire watches in the Cable Spreading Room and Relay Room, and in the East and West Cable tunnels were established as an interim compensatory measure. These watches will remain active until these violations are resolved and compliance with Section III G.2 of Appendix R to 10 CFR 50 is assured.

A fire watch had been established in the East and West Cable Tunnels shortly after the inadequacy of the cable separation was identified during our third party fire protection review. The Authority voluntarily identified this lack of adequate cable separation and the presence of the fire watches to the inspection team.

PERMANENT CORRECTIVE ACTION:

Spare conduit penetrations in the fire-rated barriers of the Control Room, Cable Spreading Room, and Relay Room will be sealed using a seal with a fire rating of not less than three hours.

The redundant cables and conduits in the East and West Cable Tunnels will be "wrapped" with a fire retardant material using a configuration that will result in a fire rating of not less than one hour.


U.S. Nuclear Regulatory Commission  
Attention: Mr. Stewart D. Ebnetter  
SUBJECT: JAFNPP  
DOCKET NO. 50-333  
NRC REGION I INSPECTION REPORT  
NUMBER 50-333/85-20

September 20, 1985  
JAFP 85-0765  
Page -3-

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

The spare conduit penetrations will be upgraded with 3 hour rated fire stops by October 31, 1985. The electrical raceways requiring wrapping to provide 1 hour rated protection will be completed by November 27, 1985.

An action plan and schedule for resolving other open items identified during inspection 85-20 are stated in Attachment (1) of this letter.



RADFORD J. CONVERSE

RJC:VMW:md  
ATTACHMENT

ATTACHMENT NO. 1 TO JAFP-85-

NEW YORK POWER AUTHORITY  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

PLANS AND SCHEDULES FOR THE RESOLUTION  
OF OPEN ITEMS ASSOCIATED WITH  
INSPECTION NO. 85-20 (FIRE PROTECTION)

ITEM NO. 50-333/85-20-01, INADEQUATE SEPARATION OF SAFE SHUTDOWN  
SYSTEMS

This item is addressed in the cover letter accompanying this attachment.

ITEM NO. 50-333/85-20-02, FIRE DETECTION SYSTEM NOT PER NFPA  
REQUIREMENT

The Authority will submit documentation or proof that the detectors used to actuate the Reactor Building water curtains are comparable to similar devices listed by a listing organization, e.g. (Underwriters Laboratories (UL) or Factory Mutual (FM)). This information will be provided by April 1, 1986.

ITEM NO. 50-333/85-20-03, SPRINKLER INSTALLATION NOT PER NATIONAL  
FIRE PROTECTION ASSOCIATION (NFPA) REQUIREMENTS

The cable tray deluge system located in the East and West cable tunnels will be evaluated for conformance to original design criteria. Special attention will be focused on the orientation of the system's water spray nozzles and assuring adequate spray coverage. This evaluation will be completed no later than January 1, 1986. Based on this evaluation, modifications if required, will be completed within the subsequent six months.

The Authority will evaluate the sprinkler systems in the Auxiliary Boiler Room to the applicable NFPA standards in existence at the time FitzPatrick was designed and constructed with special emphasis on the spray systems beneath open grating. This evaluation will be completed by January 1, 1986. Based on this evaluation, modifications if required, will be completed within the subsequent six months.

PLANS AND SCHEDULES FOR THE RESOLUTION  
OF OPEN ITEMS ASSOCIATED WITH  
INSPECTION NO. 85-20 (FIRE PROTECTION)  
(Cont'd)

ITEM NO. 50-333/85-20-04, FUNCTIONAL TESTING OF FIRE DAMPERS

As described in Section 7.1 of the inspection report, the Authority functionally tested all the fire dampers manufactured by the Ruskin Corporation during the inspection. The single damper which failed this test will be modified by the addition of a closure spring per manufacturers instructions by January 1, 1986. Since the inspection, all fire dampers were tested under ventilation flow conditions. One other damper was identified during this testing which could not close against air flow. The Authority is investigating modifications to this damper. Interim compensatory fire protection measures have been employed for these dampers. Action on this item will be completed by March 1, 1986.

The Authority has implemented a revised program to functionally test fire dampers with air flow once each operating cycle (which is approximately once every 18 months).

ITEM NO. 50-333/85-20-05, EXEMPTION REQUEST TO ALLOW TEMPORARY CORE UNCOVERY

This item remains unresolved pending NRC evaluation of June 14, 1985 exemption request. Details of the analysis are being provided by the Authority to assist the NRC staff in their review.

ITEM NO. 50-333/85-20-06, DIFFICULT ACCESS OF FUSE BOX FOR FUSE REPLACEMENT

The Authority has completed a review of each of the electrical panels where fuse replacement may be required during an emergency. To assure that personnel will be able to reach these fuses, ladders will be stored permanently near those locations where it may be necessary to change the fuse(s). A procurement order for these ladders has been placed, and the ladders will be in-place on or before October 31, 1985. This date reflects an extension of the schedule provided verbally to the inspection team leader.

The Authority has also re-examined the equipment box (holding spare fuses, ear phones, fuse puller, etc.) located near Auxiliary Shutdown Panel 25 ASP-2. Rather than installing a second duplicate box to supply redundant equipment, a shelf has been constructed and installed around the existing box. This shelf will effectively prevent the loss of equipment.

The Authority considers this item closed.

PLANS AND SCHEDULES FOR THE RESOLUTION  
OF OPEN ITEMS ASSOCIATED WITH  
INSPECTION NO. 85-20 (FIRE PROTECTION)  
(Cont'd)

ITEM NO. 50-333/85-20-07, MARGINAL EMERGENCY LIGHTING CONDITIONS

In accordance with our verbal commitment made during the inspection, the Authority has installed additional emergency lighting in the safe shutdown panel areas. A total of five additional lights have been installed: two lights have been located near Remote Shutdown Panel 25 ASP on the south side of the 300 ft. elevation of the Reactor Building; two lights in the vicinity of Auxiliary Shutdown Panel 25 ASP-3 in the Diesel Generator Switchgear Room B at the 272 ft. elevation and; one new light near 25 ASP-2 in the Reactor Building at the 242 ft. 8 in. elevation.

The Authority considers this item closed.