NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Joseph M. Farley - Unit 2	0 5 0 0 0 3 6 4	1 OF 0 3

TITLE (4) Technical Specification 3.0.3 Entered When A Fire Damper In The Penetration Room Filtration System Common Suction Line Was Closed

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
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0 2	1 8	8 8	8 8	0 0 2	0 0	0 3	2 1	8 8		0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	X OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	Special Report per Tech. Spec.3.3.3.9
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
J. D. Woodard, General Manager-Nuclear Plant	AREA CODE 2 0 5 8 9 9 - 5 1 5 6

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
B	B H	D M P	R 4 1 1	N							

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

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

On 2-18-88 and again on 2-19-88, Technical Specification 3.0.3 was entered during functional testing of a fire damper in the common suction line of both trains of the penetration room filtration (PRF) system. When this damper was closed, both trains of the PRF system were rendered inoperable.

This event was caused by cognitive personnel error in that the individuals who determined which train(s) would be affected by testing the fire damper failed to recognize that the damper was in the common suction line of both trains of the PRF system. A contributing cause to this event was that inadequate attention to drawings was used in developing and reviewing procedure FNP-2-FSP-41.2 (Fire Dampers - Functional Test) in that the procedure also failed to identify the damper as being in the common suction line of both trains of the PRF system.

The personnel involved will be counseled and the test procedures for each unit will be changed to reflect the fact that these fire dampers are in the common suction line of both trains of the PRF system.

Also, during this functional testing, the fire damper failed to close with air flow in the system due to a design deficiency. Design changes have been initiated to evaluate the options available and provide appropriate design to ensure the proper operation of the fire damper.

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(9-83)

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

Plant and System Identification

Westinghouse - Pressurized Water Reactor
Energy Industry Identification System codes are identified in the text as [XX].

Summary of Event

On 2-18-88 and again on 2-19-88, Technical Specification 3.0.3 was entered during functional testing of a fire damper in the common suction line of both trains of the penetration room filtration (PRF) [BH] system. When this damper was closed, both trains of the PRF system were rendered inoperable.

Also, during this functional testing, the fire damper failed to close with air flow in the system due to a design deficiency.

Description of Event

On 2-18-88, the unit was operating at 100% power and FNP-2-FSP-41.2 (Fire Damper - Functional Test) was in progress. At approximately 1412, fire damper 139-118-12 was tested and it failed to close with air flow in the system. This fire damper was then closed from 1412 to 1415 for lubrication and from 1435 to 1437 for testing. On 2-19-88, from 0930 to 0935, this fire damper was closed again to evaluate how to repair the damper.

On 2-19-88 at 1421, it was determined that this fire damper is in the common suction line of both trains of the PRF system. Thus, closure of this damper rendered both trains of the PRF system inoperable and Technical Specification 3.0.3 had been entered.

Also, since the fire damper would not close with air flow in the system, it was declared inoperable as a fire barrier. Technical Specification 3.7.12 requires the fire damper to be returned to operable status within seven days or a Special Report must be submitted within the following thirty days. Since the fire damper could not be repaired within the seven days, this report also fulfills those requirements.

Cause of Event

Entering Technical Specification 3.0.3 was caused by cognitive personnel error. Prior to testing the fire damper, a Shift Foreman - Operating and a fire protection group member (the individual performing the test) walked down the PRF system to determine which train(s) would be affected by testing the fire damper. When they examined the piping arrangement in the PRF room, they did not have the system drawing with them and incorrectly concluded that closure of the fire damper would only affect one train of the PRF system.

A contributing cause to this event was that inadequate attention to drawings was used in developing and reviewing procedure FNP-2-FSP-41.2 (Fire Dampers - Functional Test) in that the procedure also failed to identify the damper as being in the common suction line of both trains of the PRF system.

The failure of the fire damper to close with air flow was caused by design deficiency.

Reportability Analysis and Safety Assessment

This event is reportable because Technical Specification 3.0.3 was entered. However, Technical Specification 3.0.3 was in effect for a total of only ten minutes. No adverse condition resulted and there was no effect on plant operation. Therefore, the health and safety of the public were not affected by this event.

This event is also reportable because Technical Specification 3.7.12 requires this fire damper to be returned to operable status within seven days or a Special Report must be submitted within the following 30 days. This report also fulfills these requirements.

Corrective Action

The personnel who made the incorrect conclusion concerning the effects of closing the fire damper will be counseled to ensure that the necessary drawings are used in making determinations about system operability. The test procedure for each unit will be changed to reflect the fact that these fire dampers are in the common suction line of both trains of the PRF system. The personnel who developed and reviewed the procedure have been instructed to be more thorough in their attention to drawings in procedure preparation and review to ensure that all areas are adequately addressed. A review is being performed to identify any additional fire dampers which can affect both trains of a system.

A design change has been initiated to evaluate the options available and provide appropriate design to ensure proper operation of the fire damper. This design change is expected to be implemented as soon as practicable during the first outage of sufficient duration during which the required conditions exist (cold shutdown) after the design change and procurement have been completed.

Additional Information

No similar events have been reported by Farley Nuclear Plant.

This event would not have been more severe if it had occurred under different operating conditions.

The fire damper is a curtain type damper with spring kits installed. It is manufactured by:

Ruskin Division
Philips Industries, Incorporated
3900 Doctor Greaves Road
Grandview, Missouri 64030

Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291-0400
Telephone 205 250-1835

R. P. McDonald
Senior Vice President

Alabama Power
the southern electric system

March 21, 1988

Docket No. 50-364

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Dear Sir:

Joseph M. Farley Nuclear Plant - Unit 2
Licensee Event Report No. LER 88-002-00

Joseph M. Farley Nuclear Plant, Unit 2, Licensee Event Report No. LER 88-002-00 is being submitted in accordance with 10CFR50.73.

If you have any questions, please advise.

Respectfully submitted,

R. P. McDonald

RPM/JAR:dst-D-1.49

Enclosure

cc: IE, Region II

IE22
1/1