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on January 22, 1986 at 1200 hours, with the unit in cold shutdown to repair the #4 Main Turbine Control Valve, the fire protection assistant discovered that monthly Surveillance Tests 7-022-951-0 and 7-022-953-0 (fire hose station and hose cart visual inspections, respectively) did not meet the surveillance requirements of Technical Specifications 4.7.6.5.a and 4.7.6.6.a. The tests were required to be performed prior to January 19, 1986. Although all equipment was subsequently found to satisfy the surveillance test criteria, all technical specification fire hose stations and hose cart stations are considered inoperable in accordance with the requirements of Technical Specification 4.0.3, during the time interval between January 19, 1986 and January 22, 1986. The cause of this event was inadequate communications among the Fire Protection group members and an inadequate supervisory overview of the surveillance test performance. Upon discovery, the surveillance tests were immediately conducted and all equipment was found to be satisfactory. All stations were declared operable and all personnel responsible were counseled to emphasize the importance of due dates. There were no adverse effects as a result of this event.

BRC Form 364

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WAC Form 366A (8-83)	LICENSEE EVENT R	APPROVED DIME NO. 3150-0104 EXPIRES: 6/31/85					
FACILITY NAME (1)		DOCKET NUMBER (2)	LER HUMBER	16;	PAGE (3)		
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Unit Condition Prior to the Event:

Mode 4 (Cold Shutdown)
Reactor Power 0%
(Shutdown for repair of the #4 Main Turbine Control Valve)

Description of the Event:

Technical Specification 4.7.6.5.a states: "Each of the fire hose stations shown in Table 3.7.6.5-1 shall be demonstrated OPERABLE: (a) At least once per 31 days by a visual inspection of the fire hose stations accessible during plant operation to assure all required equipment is at the station". Surveillance Test 7-022-953-0, fire hose station visual inspection test, includes fire hose stations in Table 3:7.6.5-1.

Technical Specification 4.7.6.6.a states: "Each of the yard fire hydrants and hose cart houses shown in Table 3.7.6.6-1 shall be demonstrated OPERABLE: (a) At least once per 31 days by visual inspection of the hose cart house to assure all required equipment is at the hose house". Surveillance Test 7-022-953-0, hose cart visual inspection test, includes the hose cart house in Table 3.7.6.6.-1.

On January 22, 1986, it was determined that monthly Surveillance Tests ST-7-022-951-0 and ST-7-022-953-0 had not been performed in accordance with the "once per 31 days" visual inspection requirements of Technical Specifications 4.7.6.5.a and 4.7.6.6.a.

During the time interval between January 19, 1986 and January 22, 1986, all fire hose stations and the hose cart station are considered inoperable in accordance with the requirements of Technical Specification 4.0.3.

The EIIS code for the affected system is KP.

10-43: L10	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							APPROVED OMS NO. 3150-0104 EXPIRES. 8/31/85				
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Consequences of the Event:

There were no adverse consequences resulting from this event. The possible consequences which could have resulted from this event were minimal. Although the hose cart and hose stations were considered inoperable, the results of the test performed on the date of discovery were satisfactory. The hose cart house in question provides backup manual suppression protection for the diesel generators. These areas were protected by operable pre-action sprinkler systems and smoke and flame detection systems. These systems would have provided early detection and control of a fire in any diesel generator compartment.

Additionally, various areas of the control and reactor enclosures are provided with detection and suppression systems as described in the Fire Protection Evaluation Report. Early detection and automatic suppression would have been accomplished.

Cause of the Event:

The cause of this event was inadequate communications of surveillance test due dates among the Fire Protection group members and an inadequate supervisory overview of the surveillance test performance.

Corrective Actions:

ST-7-022-951-0 and ST-7-022-953-0 were immediately performed on January 22, 1986 and all fire hose stations and hose cart stations were declared operable. All personnel responsible for

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this event were immediately counseled to emphasize the importance of the due dates on all surveillance tests pertinent to the Fire Protection Group.

Action Taken to Prevent Recurrence:

The following mechanisms have been placed in effect to highlight all fire protection surveillance tests:

- (1) A highly visible board has been placed in the Fire Protection Office. This board contains the surveillance test title, number, test due date and responsibility columns. Each surveillance test is listed on this board with its present due date and the next three due dates. This board is reviewed on a biweekly basis by the fire protection assistant to ensure that each test has been assigned to an individual in the group.
- (2) The senior staff member responsible for fire protection reviews the master test schedule, written on this board, on a weekly basis and provides the supervisory overview of all surveillance test performances.

Additionally, personnel in the fire protection group have been counseled on the importance of assuring that when surveillance tests are assigned, the test due dates are understood and that personnel should review the surveillance test board periodically.

Previous Similar Occurences

Previous Limerick LERs 84-016, 85-069, 85-008, and 85-096 report events of missed surveillance tests.

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

February 21, 1986

Docket No. 50-352

Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555

SUBJECT:

Licensee Event Report

Limerick Generating Station - Unit 1

This LER deals with the failure to meet the surveillance requirements on the Fire Hose Stations and Hose Cart Houses as required by Technical Specification 4.7.6.5.a and Technical Specification 4.7.6.6.a.

Reference:

Docket No. 50-352

Report Number:

86-006

Revision Number:

00 January 19, 1986

Event Date: Report Date:

February 21, 1986

Facility:

Limerick Generating Station P.O. Box A, Sanatoga, PA 19464

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Very truly yours,

m Willial

W. T. Ullrich

Superintendent Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC E. M. Kelly, Senior Resident Site Inspector See Attached Service List