

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2 8 B	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 365A's) (17)

At 1429 hours on April 5, 1988, Waterford Steam Electric Station Unit 3 was in cold shutdown when Vital Area Fire Door (VAFD) 97 was discovered to be impaired. Due to a malfunctioning locking mechanism the door had been posted by a security officer since April 1, 1988. On April 5, 1988, a utility mechanic removed the lockset from the door and determined the lock could not be repaired. Since a new lockset was not immediately available the mechanic stopped work at 0146 hours leaving a small hole through the door. At 1015 hours the area was devitalized and the posted security officer was reassigned. At 1429 hours a security officer trained in fire door integrity was performing the Technical Specification (TS) Fire Door Surveillance and noticed the lockset had been removed. Since this is a fire barrier design deviation, a fire impairment was issued and an hourly fire watch assigned to check the door in accordance with TS 3.7.11. Therefore, the plant was in a condition prohibited by TS for approximately four hours.

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

At 0607 hours on April 1, 1988 the locking mechanism on VAFD 97 was discovered to be malfunctioning and the door was posted by a security officer. When a vital area door lock malfunctions the door is posted for security reasons. The standard practice is for security to request a fire impairment be issued when a lock malfunctions, and one is issued. However since this is a tornado door with separate latch and dogging mechanisms, either of which allows the door to function as a fire barrier, a fire impairment was not issued. At 0959 hours on April 4, 1988 Condition Identification 254915 was generated requesting rework of the door latch. From the Condition Identification, a Work Authorization (WA) package was prepared. The work authorization package issued, WA 99000150, was a standard package with instructions for work on a door/gate. This standard package was designed in response to concerns that security doors were not being repaired expeditiously, however it bypasses the standard job planning process which would check the fire impairment status of the door. At 2335 hours on April 4, 1988, a utility mechanic commenced work on the door and incorrectly assumed the door was already impaired and the posted security officer was the firewatch. The lockset was removed from the door and found to be irreparable. The mechanic had brought a replacement lockset but it was the wrong type and another lockset could only be obtained by security personnel on dayshift. The mechanic stopped work at 0146 hours on April 5, 1988.

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At 1015 hours the areas surrounding VAFD 97 were devitalized. Devitalization allows uncontrolled access through security doors, devitalization is occasionally utilized during maintenance periods when there is frequent traffic through a door. The area was devitalized and the security officer posted at the door was reassigned. When the area was devitalized Security personnel requested the door be impaired. The Shift Supervisor realized maintenance work was not ready to start in the area and therefore did not issue a fire impairment. At 1429 hours a security officer from the Fire Door Surveillance Unit was performing the daily Fire Door Surveillance and discovered VAFD 97 without a lockset. Security officers in the Fire Door Surveillance Unit are trained in fire door integrity and the officer recognized the removed lockset as a potential fire impairment. A fire impairment was then issued and an hourly firewatch established in accordance with TS 3.7.11.

The root cause of this event was inadequate administrative control. Although it is standard practice to issue an impairment when a door locking mechanism fails, the impairment did not physically exist until the lockset was removed. The Work Authorization Preparation and Implementation Procedure, UNT-5-015 step 5.6.3 requires procedure FP-1-021, "Fire Barrier Removal and Restoration" to be used when planning maintenance activities involving fire-rated assemblies and penetration seals. Procedure FP-1-021 requires that any work involving removal or possible removal of a fire-rated assembly or assembly seal shall employ this procedure. Both the Fire Protection Procedure and the Standard Work Authorization are based on the assumption that a fire impairment has been recognized and issued when the problem is identified. There was no positive method to ensure a fire impairment was issued when an impairment was created during maintenance.

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TEXT (If more space is required, use additional NRC Form 366A 2/117)

An hourly firewatch patrol including VAFD 97 was established from 1429 hours on April 5, 1988 until the door was repaired. A new standard Work Authorization is now issued for work on doors. This new package is WA 09000193 and a note is enclosed in the instructions stating "if rework is interrupted and a fire barrier is breached, a fire impairment must be created". Administrative Procedure, UNT-5-002, "Condition Identification" will be revised to require a fire impairment be issued when a problem is identified with a fire appliance/fire-rated assembly/seal assembly. This procedure will be revised by July 1, 1988. The mechanic who removed the lockset was counseled to check for fire impairments prior to working on fire barriers. "Security Procedure PS-16-101 "Security Procedure During Refueling and Major Maintenance Operations," which is the devitalization procedure, will be revised to require a fire impairment be issued prior to devitalization of a fire door. The procedure will be revised by August 1, 1988. A procedure is being developed by the security department to provide guidance for repair and preventive maintenance of doors. This procedure will be completed by August 1, 1988. Until management is assured that the above controls are effectively implemented, frequent plant inspections are being conducted as part of the Management Observation Program to provide additional assurance that fire protection requirements are met.

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Although the missing lockset left a hole in the door, the hole did not go straight through the door and created a right angle path with less opening than the allowable clearance below the door. Although this is technically a fire impairment because it is a design deviation, the level of actual fire barrier degradation is not considered to be significant. Throughout the four-hour event fire detection equipment was operable on one side of the door and a records indicate that firewatch qualified personnel transited the area at least once per hour. The plant was in a mode in which a fire in the areas separated by this door would not have affected plant safety. There was therefore, a level of assurance equivalent to that of a fully operable door that a fire occurring in either area would not affect equipment in the other, and even if such a fire had occurred and spread to both areas no equipment required for plant safety would have been affected.

SIMILAR EVENTS

None

PLANT CONTACT

A.L. holder, Fire Protection and Safety Department Head, 504/464-3482.



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May 6, 1988

W3A88-0053
A4.05
QA

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

SUBJECT: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Reporting of Licensee Event Report

Attached is Licensee Event Report Number LER-88-006-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

N.S. Carns
Plant Manager - Nuclear

NSC/WMC:rk

Attachment

cc: R.D. Martin, NRC Resident Inspectors Office, INPO Records Center (J.T. Wheelock), E.L. Blake, W.M. Stevenson, D.L. Wigginton

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