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While evaluating a Non-Conformance Report (NCR) for Electrical Separation or Appendix R infraction, a general walkdown was made on 3/18/85 to observe any additional instances similar to the ones already encountered. The walkdown resulted in identifying 4 types of possible infractions with no design impact and one type which may have design impact. A Maintenance Work Request (MWR) was implemented to eliminate any infractions which were readily correctable. All items were put on the fire watch until either corrected or determined that an electrical separation or Appendix R condition does not exist. Further evaluations are being made to render decisions on whether these categories are infractions and to derive steps to be taken to alleviate these conditions.

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NRC Form 366A . (9-83)

#### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)								Т	LER NUMBER (6)									PAGE (3)			
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

### Plant Condition

- a) Operating Mode 1
- b) Power Level 100%

### Event

In February, 1985, 4 cables were discovered (3 in the cable spreading room and 1 in the cable chase area) which appeared to be an infraction of the Electrical Separation criteria or Appendix R. The first investigation resulted in an evaluation which showed no infraction of Electrical Separation or Appendix R had occurred. However, further discussions with Engineering, Tech. Staff and Maintenance personnel uncovered other areas of concern which needed evaluation. Due to the general concerns surfacing, a walkdown was made on 3/18/85 to observe any additional instances similar to the cable spreading/cable chase rooms conditions. A total of 28 items were found which can be categorized as follows:

- 1. Spared cables hanging out of conduits/raceways.
- 2. Temporary cables, ie., extension cords.
- Communication cables
- 4. Cables which run out of and back into raceways.
- 5. Spatial separation involving raceways carrying prime circuits (Non-Class 1E circuits connected to Class 1E power supply.

All 28 items were put on the fire watch until the problem was alleviated. An MWR was processed and implemented to alleviate as many items as possible. Twenty-three items were eliminated as an electrical separation concern whereas all 28 items were not an Appendix R infraction. The remaining five electrical separation infractions are of a type which leads us to expand our evaluation to other areas of the plant.

# Immediate Corrective Action

- o All items were placed on the fire watch tour.
- o An MWR was issued to remove those items which do not have design implications, whether they be Electrical Separation infractions or not.

# Further Corrective Action

- o Alleviate future instances by:
  - 1. Revising Plant procedures to provide additional instructions which address electrical separation requirements.
  - 2. Providing training to the craft personnel on proper use of temporary cables with respect to Electrical Separation and Appendix R criteria.
  - 3. Review of Appendix 3 to the Engineering Design Criteria for possible areas of clarification in order to enhance the acceptance criteria.

NRC Form 366A * (9-83)	LICENSEE EVENT REP		U.S. NUCLEAR REGULATORY COMM.SSION APPROVED OMB NO. 3150-0104 EXPIRES. 8/31/85						
FACILITY NAME (1)		DOCKET NUMBER (2)	L	ER NUMBER (6)	PAGE (3)				
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TEXT (If more space is required, use additional MRC Form 306A's) (17)

4. Complete the on-going evaluation to decide the necessary steps to be taken, and implement the changes, if necessary, to correct the spatial conditions in regard to the prime raceways.

### Safety Significance

The safety significance concerns the effects of violation of the spatial requirements between redundant divisional raceways. A raceway fire in one division could propagate and cause a failure in the opposite division. It should be noted that a review has shown that none of the infractions found had the capability to compromise the Plant's Appendix R dedicated safe shutdown path.

### Similar Events

Refer to LER 84-031-003

# **Washington Public Power Supply System**

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

Docket No. 50-397 April 16, 1985

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

Subject: NUCLEAR PLANT NO. 2

LICENSEE EVENT REPORT NO. 85-023

Dear Sir:

Transmitted herewith is Licensee Event Report No. 85-023 for WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the item of reportability, corrective action taken, and action taken to preclude recurrence.

Very truly yours,

C. M. Powers (M/D 927M)

WNP-2 Plant Manager

CMP:mm

Enclosure:

Licensee Event Report No. 85-023

cc: Mr. John B. Martin, NRC - Region V Mr. A. D. Toth, NRC - Site (901A) Ms. Dottie Sherman, ANI INPO Records Center - Atlanta, GA