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



William Fernandez II **Resident Manager**

June 30, 1989 JAFP-89-0487

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United States Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

REFERENCE: DOCKET NO. 50-333 LICENSEE EVENT REPORT: 89-011-00

Dear Sir:

Enclosed please find referenced Licensee Event Report in accordance with 10 CFR 50.73.

If there are any questions concerning this report, please contact Mr. W. Verne Childs at (315) 349-6071.

Very truly yours,

MILLIAM FERNANDEZ

WF:WVC:lar

Enclosure

cc: USNRC, Region I (1) INPO Records Center, Atlanta, GA (1) American Nuclear Insurers (1) Internal Power Authority Distribution NRC Resident Inspector Document Control Center LER/OR File

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NRC Form 386 (9-83) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OM8 NO. 3150-0104 EXPIRES: 8/31/85

FACILITY NAME (1)

NRC Form 386A

CILITY NAME (1)	P	OCKI	ET N	ICIMI	BER	(2)						LI	ERI	NUN	ABER	(6)					P	AGE (3)	
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Description of Event

On May 31, 1989 at 1500 hours during normal operation at 100% rated power it was determined that floor drains [WK] in the Emergency Diesel Generator (EDG) Rooms [NB] had been modified in 1979 without first evaluating the modification as required by 10CFR50.59.

As part of activities associated with an NRC Safety System Functional Inspection (SSFI), the NRC inspection team noted the existence of the plugs in the floor drains. SSFI team personnel expressed concern that actuation of the sprinkler system [KP] in an EDG room for one safety division in response to a postulated fuel oil fire could result in spreading of the postulated fire to the adjacent 4160 VAC emergency switchgear [EB] room and/or adjacent EDG in the other safety division. As a result, plugging of the floor drains prior to evaluation in accordance with 10CFR50.59 created a potential condition outside of the plant design basis and is a reportable event under 10CFR50.73(a)(2)(ii)(B).

The floor drain plugs were installed in 1979 in response to concerns of the New York State Department of Environmental Conservation (NYSDEC). At that time the EDG engine cooling water jacket contained a potassium chromate corrosion inhibitor. Since the EDG room floor drain system is routed to an oil separator and then to the plant storm drain system, NYSDEC was concerned that leakage or spillage of engine coolant during maintenance would result in discharge of the toxic potassium chromate directly to the environment (Lake Ontario) [BS] via the floor drains, oil separator, and storm sewer path. In response to this concern each of the EDG room floor drains were plugged and this condition was made part of the State Pollutant Discharge Elimination System (SPDES) permit.

In 1986 the engine coolant containing the toxic potassium chromate was removed and replaced with coolant containing non-toxic borate-nitrate corrosion inhibitor. On February 28, 1989 the New York Power Authority (NYPA) submitted a request to NYSDEC to change the SPDES permit to allow removal of the EDG room floor drain plugs. Due to delays in actual changes to the permit because of requirements for a public notice and comment period, NYPA verbally informed NYSDEC on April 7, 1989 of our intent to remove the plugs. This verbal notification was followed with written notification on April 12, 1989 and the plugs were actually removed on May 31, 1989 to restore the drain system to the original design configuration.

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Two additional areas in the plant also have floor drains plugged to meet NYSDEC requirements. The Reactor Water Recirculation (RWR) system [AD] motor generator room floor drains are plugged to prevent accidental draining of lubricating oil to the storm drains and the west diesel fire pump room drain is plugged to prevent accidental draining of lubricating oil or fuel oil to the plant cooling water intake forebay area. Reevaluation of the plugging of these drains is continuing.

Cause of Event

The event was caused by inadequate procedures. At the time the floor drain plugs were installed in 1979 procedures for control of temporary modifications did not address mechanical modifications such as blind flanges or pipe plugs. In addition, modification control procedures did not require as rigorous an evaluation of non-safety-related systems (such as the EDG room floor drain system) or the potential effects of modification of non-safety-related systems as was required for safety-related modifications. As a result, the floor drain plugs were installed under maintenance control procedures rather than as a modification which would have included evaluation in accordance with 10CFR50.59.

It should also be noted that procedural controls for modifications have been upgraded several times since 1979. These procedures now prevent events of this type. No additional action to correct procedure deficiencies is considered necessary.

Analysis of Events

A conservative analysis of the possible spread of a postulated fire with the floor drains plugged has been completed. Based on this analysis it is concluded that there is no credible EDG room fire which would have been spread from one safety division to the other safety division as a result of the floor drains being plugged. As part of the analysis, it was assumed that plant fire brigade personnel would respond within 10 minutes and take appropriate action.

The following conservative assumptions were also used in performing the analysis:

- Water pressure at the EDG room sprinkler heads was assumed to be at the maximum pressure which can be provided by the fire pumps with corrections for elevation difference between fire pumps and the sprinkler heads. This assumption results in the maximum rate at which water is introduced to the EDG room floor and sets the minimum me required to overflow the curbs (dikes) at each EDG room door.

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Corrective Action						
Short-Term Corrective Action	1					

Long-Term Corrective Action

 Complete reevaluation of plugged floor drains in the reactor water recirculation system motor generator and west diesel fire pimp rooms.

Additional Information

Failed Components: None

Similar Events: None

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



William Fernandez II Resident Manager

June 30, 1989 JAFP-89-0487

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United States Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

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Enclosed please find referenced Licensee Event Report in accordance with 10 CFR 50.73.

If there are any questions concerning this report, please contact Mr. W. Verne Childs at (315) 349-6071.

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WILLIAM FERNANDEZ

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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OME NO. 3150-0104

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NRC Form 386A

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The floor drain plugs were installed in 1979 in response to concerns of the New York State Department of Environmental Conservation (NYSDEC). At that time the EDG engine cooling water jacket contained a potassium chromate corrosion inhibitor. Since the EDG room floor drain system is routed to an oil separator and then to the plant storm drain system, NYSDEC was concerned that leakage or spillage of engine coolant during maintenance would result in discharge of the toxic potassium chromate directly to the environment (Lake Ontario) [BS] via the floor drains, oil separator, and storm sewer path. In response to this concern each of the EDG room floor drains were plugged and this condition was made part of the State Pollutant Discharge Elimination System (SPDES) permit.

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Two additional areas in the plant also have floor drains plugged to meet NYSDEC requirements. The Reactor Water Recirculation (RWR) system [AD] motor generator room floor drains are plugged to prevent accidental draining of lubricating oil to the storm drains and the west diesel fire pump room drain is plugged to prevent accidental draining of lubricating oil or fuel oil to the plant cooling water intake forebay area. Reevaluation of the plugging of these drains is continuing.

Cause of Event

The event was caused by inadequate procedures. At the time the floor drain plugs were installed in 1979 procedures for control of temporary modifications did not address mechanical modifications such as blind flanges or pipe plugs. In addition, modification control procedures did not require as rigorous an evaluation of non-safety-related systems (such as the EDG room floor drain system) or the potential effects of modification of non-safety-related systems as was required for safety-related modifications. As a result, the floor drain plugs were installed under maintenance control procedures rather than as a modification which would have included fraluation in accordance with 10CFR50.59.

It should also be noted that procedural controls for modifications have been upgraded several times since 1979. These procedures now prevent events of this type. No additional action to correct procedure deficiencies is considered necessary.

Analysis of Events

A conservative analysis of the possible spread of a postulated fire with the floor drains plugged has been completed. Based on this analysis it is concluded that there is no credible FDG room fire which would have been spread from one safety division to the other safety division as a result of the floor drains being plugged. As part of the analysis, it was assumed that plant fire brigade personnel would respond within 10 minutes and take appropriate action.

The following conservative assumptions were also used in performing the analysis:

- Water pressure at the EDG room sprinkler heads was assumed to be at the maximum pressure which can be provided by the fire pumps with corrections for elevation difference between fire pumps and the sprinkler heads. This assumption results in the maximum rate at which water is introduced to the EDG room floor and sets the minimum time required to overflow the curbs (dikes) at each EDG room door.

LICENSEE EVEN	T REPORT (LER) TEXT CON	US NUCL TINUATION APP	EAR REGULATORY COMMISSIO ROVED ONE NO. 3150-0104 IRES: 6/31/06
PACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
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TEXT (Il mare aparat la requirad, una additional MRC Form 380(4'a) (17)

- Leakage of water around EDG room doors to surrounding non-safety-related areas was assumed to be zero. This assumption also minimizes the calculated time required to overflow the curbs and spread burning fuel oil to adjacent safety-related areas.

Analysis of potential flooding of EDG rooms and/or the adjacent 4160 VAC emergency switchgear rooms with the EDG room floor drains plugged had been previously completed. This analysis indicated that the safety-related equipment would not be incapacitated as a result of credible failures of potential flood water sources.

Corrective Action

Short-Term Corrective Action

1) Remove the floor drain plugs to restore the drains to the original design (completed on May 31, 1989).

Long-Term Corrective Action

 Complete reevaluation of plugged floor drains in the reactor water recirculation system motor generator and west diesel fire pump rooms.

Additional Information

Failed Components: None

Similar Events: None