



**LOUISIANA**  
POWER & LIGHT

WATERFORD 3 SES • P.O. BOX B • KILLONA, LA 70066-0751

Ref: 10CFR50.73(a)(2)(i)

May 19, 1989

W3A89-0139

A4.05

QA

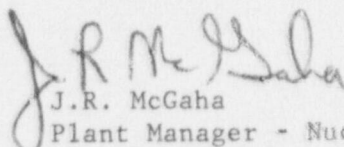
U.S. Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38

Reporting of Licensee Event Report

Attached is Licensee Event Report Number LER-88-006-01 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i). The LER has been revised to correct some of the information in the original report.

Very truly yours,

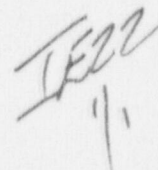
  
J.R. McGaha  
Plant Manager - Nuclear

JRM/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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PDR ALOCK 05000382  
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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Waterford Steam Electric Station Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 3 8 2				PAGE (3) 1 OF 0 7		
TITLE (4) Fire Barrier Degraded Due to Inadequate Administrative Control																
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)			
									N/A				0 5 0 0 0			
0 4	0 5	8 8	8 8	0 0 6	0 1	0 5	1 9	8 9	N/A				0 5 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)														
5		20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)		
0 10 10		20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
20.406(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)								
20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)								
20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)								
LICENSEE CONTACT FOR THIS LER (12)																
NAME A.L. Holder, Fire Protection & Safety Department Head										TELEPHONE NUMBER AREA CODE 5 10 4 4 6 4 1 - 3 4 8 2						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO				

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

At 1429 hours on April 5, 1988, Waterford Steam Electric Station Unit 3 was in cold shutdown when a Vital Area Fire Door (VAFD) was discovered to be impaired. The VAFD was posted by security since April 1, 1988 due to a malfunctioning lock. On April 5, 1988 a utility mechanic removed the lock but could not repair it and secured from the job at 0146. At 1015 hours the area was devitalized and a posted security officer was no longer required. At 1429 hours a security officer, trained in fire door integrity, was performing the daily Fire Door Surveillance when he discovered the locking mechanism was missing from the VAFD. Since removal of the lock is a fire barrier design deviation a fire impairment was issued in accordance with Technical Specification 3.7.11.

The root cause of this event was inadequate administrative control. There was no positive means to ensure a fire impairment was issued. To prevent recurrence a note has been added to the work authorization instructions. Procedures have been revised to require that a fire protection impairment be issued when a problem is identified with a fire protection appliance. Qualified fire watches transited the area at least once per hour while the VAFD was impaired. The plant was in a mode in which a fire in this area would not have affected plant safety. There was no threat to the health or safety of the public or plant personnel.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   8	—   0   0   6	—   0   10	2	OF	0   7

TEXT (If more space is required, use additional NRC Form 366A'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.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/86

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8   8	-   0   0   6	-   0   1	0   3	OF 0   7

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.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104  
EXPIRES: 8/31/88

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   8	—   0   0   6	—   0   1	0   4	OF	0   7

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

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 plant had been considered to be in a condition prohibited by TS from 1015 hours on April 5, 1988, until the hourly firewatch was established at 1429 hours on April 5, 1988. However, at 0900 hours on April 19, 1989, Waterford Steam Electric Station was operating at 100% power when a quality notice was issued stating that information reported in the original version of the LER 88-006 was incorrect. The original LER reported that fire detection equipment was operable on one side of the door; however, it was later discovered that there is no fire detection equipment on either side of the door. This discovery invalidates the immediate corrective action performed. An hourly fire watch was established when the lock was discovered to be missing, which is required when fire detection equipment is operable on one side of the door. Without fire detection equipment on either side of the door a continuous firewatch should have been established. Therefore, the plant operated in a condition prohibited by TS from 1015 hours on April 5, 1988, until the lock was restored at 1506 hours on April 12, 1988.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0 5 0 0 0 3 8 2 8 8 - 0 0 6 - 0 1	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
					0 5	OF 0 7

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

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. Assigning the wrong type of firewatch and not discovering the error in the fire impairment or validation of the information in the original version of the LER is attributed to personnel error. The error has been discussed with the personnel involved.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0 5 0 0 0 3 8 2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	— 0 0 6	— 0 1	0 6	OF	0 7

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

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" was revised to require a fire impairment to be issued when a problem is identified with a fire appliance/fire-rated assembly/seal assembly. The event was discussed with the mechanic who removed the lockset 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, was revised to require a fire impairment to be issued prior to devitalization of a fire door. Maintenance Procedure MM-06-106 "Plant Door/Plant Door Equipment Maintenance" was developed to provide instructions for repair and preventive maintenance of plant doors and plant door equipment. 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.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)  Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   8	—   0   0   6	—   0   1	0   7	OF	0   7

TEXT (If more space is required, use additional NRC Form 365A's) (17)

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. Records indicate that qualified firewatch personnel transited the area, at least once per hour between the lock's removal and when the impairment was discovered and an hourly firewatch established. 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. There was no threat to the health or safety of the public or plant personnel.

SIMILAR EVENTS

None

PLANT CONTACT

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