



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064**

December 7, 2000

EA-00-202

Craig Anderson, Vice President
Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
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**SUBJECT: FINAL SIGNIFICANCE DETERMINATION FOR AN APPARENT SIGNIFICANT
FINDING (NRC INSPECTION REPORT NO. 50-313/00-16; 50-368/00-16)
ARKANSAS NUCLEAR ONE**

Dear Mr. Anderson:

The purpose of this letter is to provide you with the final results of our significance determination of the preliminary White finding identified in the subject inspection report. The inspection finding was assessed using the significance determination process and was preliminarily characterized as White, (i.e., an issue with low to moderate increased importance to safety, which may require additional NRC inspections). This White finding involved a double leaf fire door, separating the ANO-2 vital switchgear rooms, that was found with the stationary leaf unlatched. We considered the fire door to be inoperable in this condition, consistent with the basis for fire barrier operability identified in ANO-2 Safety Analysis Report Appendix 9D.5.3.

You provided us a letter dated October 24, 2000, which provided additional information that had not been identified during the inspection or prior to issuance of our inspection report. You identified that qualified roving fire watches traversed the ANO-2 north and south vital switchgear rooms on an hourly basis during the time that Fire Door 269 was unlatched. These fire watches transited through this area as part of their typical travel pattern for providing a compensatory action on an unrelated issue in an unrelated area. We have reviewed fire watch qualification records, fire watch patrol records, and security records to confirm your statement. Based on this new information, we have credited the periodic presence of trained personnel in minimizing the potential consequences of a fire in this area and have downgraded our characterization of the risk significance of this finding from White to Green (i.e., an issue with very low risk significance that can be adequately addressed by the licensee without additional NRC oversight).

Based on the ANO-2 Safety Analysis Report, Appendix 9D.5, an hourly roving fire watch is an acceptable compensatory measure for an inoperable fire barrier, on the condition that fire detectors, with control room alarms, are operable on one side of the inoperable barrier. Fire detectors, with control room alarms, were operable on both sides of the barrier during the period of concern.

However, we note that a fire watch had not been properly established for the inoperable fire door in accordance with your license. ANO-2 Technical Specification 6.8.1.f required that written procedures shall be established, implemented, and maintained covering the fire protection program. Procedures 1000.152, "Unit 1 and Unit 2 Fire Protection Technical Specifications," Revision 3, and 1000.120, "ANO Fire Watch Program," Revision 9, required that any activity at ANO which degrades or breaches a regulatory required fire barrier must be identified and controlled to ensure compliance with regulations and Technical Specifications and to minimize the effects of fire. The required identification and controls for the affected barrier are to be documented on a fire watch posting record. The fire watch posting record documents review and acceptability of the affected barrier and any required compensatory action.

Contrary to the above, no fire watch posting record was initiated for Fire Door 269 for the period it was unlatched, i.e., from approximately June 22 - 26, 2000, as required by the fire protection program implementing procedures. As a result, ANO could not provide reasonable assurance that the fire watch would be maintained throughout the entire period that the fire barrier was degraded. This is a violation of ANO-2 Technical Specification 6.8.1.f. As stated above, this violation has very low safety significance (Green) and is being treated as a noncited violation (NCV), consistent with Section VI.A of the Enforcement Policy.

We disagreed with your conclusion that the violation was minor. Fire Door 269 is one of the most risk significant fire barriers in the plant. We concluded that the violation involved a credible impact on safety because the fire watch was not adequately controlled to ensure the effects of a fire would be minimized. For example, if this degraded condition had not been identified by the NRC, conditions could have resulted such that the fire watch tour could have been missed. In addition, had the fire detection system been declared inoperable, a more safety significant condition would have resulted as the licensee would have been unaware that a continuous fire watch was required. The NRC is also concerned about the overall adequacy of your fire watch training and qualification program and attention to detail regarding fire protection features by fire watch personnel and plant staff in general. Approximately 114 fire watch patrols and many other station personnel traversed the vital switchgear rooms during the period of concern without identifying the unlatched fire door.

Since the violation involved a fire protection feature or defense in depth, it was analyzed by the fire protection significance determination process. The normal operating state category used to quantify degradation ratings of fire protection defense-in-depth elements in the fire protection significance determination process reflects full compliance with existing regulations and regulatory guidance. A fire protection system or feature is considered to be in a normal operating state when its design conforms with the minimum design, installation, and performance criteria specified by the code of record. Credit for compensatory measures (i.e., credit for the hourly fire watch patrol) results in a degradation rating of "moderate" in determining the fire barrier degradation term. Substituting this result into the expression for fire mitigation frequency as described in our inspection report results in the safety significance determination of Green.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the

Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions concerning this final significance determination please contact Linda Joy Smith at (817) 860-8137.

Sincerely,

/RA/

Ken E. Brockman, Director
Division of Reactor Projects

Docket Nos.: 50-313, 50-368
License Nos.: DPR-51, NPF-6

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