

NRC 2003-0042

10 CFR 50.48

May 9, 2003

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

DOCKETS 50-266 AND 50-301
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
REPORTING OF FIRE BARRIERS DEGRADED FOR MORE THAN SEVEN DAYS

Enclosed is a special 30 day report for Point Beach Nuclear Plant (PBNP), Unit 1 and Unit 2. This report is provided in accordance with the PBNP Fire Protection Evaluation Report (FPER), Section 8.1.5. That section requires the submittal of a report to the U. S. Nuclear Regulatory Commission when degradation of fire protection systems or components exceeds the time listed in FPER Section 8.1.3. Paragraph C.1.b (4) of that section requires a report if an inoperable fire barrier is not restored to an operable status within a seven-day period. This letter is being provided to report two such conditions.

Insufficient Fire Barrier Penetration Seal Depth

During a walkdown of various plant fire penetration seals, penetration M-3-3-46-27A was identified as being significantly thinner than other seals in the immediate area. This penetration is a blackout seal located between the floor of the Control Room and ceiling of the Cable Spreading Room. The seal is located beneath control board C01. Review of the history of this penetration indicates that this seal is closed per typical detail W-E-02-03, which was a retrofit detail used to upgrade existing board and fiber penetration seals. According to typical detail W-E-02-03 this seal should have a ½" thick marinite board installed as damming over the bottom of the seal. Above the damming board is a 3" min. to 12" max, bulk Kaowool fiber seal. Above the fiber seal is a 5" thick ICMS product 60 foam seal. Based on these measurements the seal should have a thickness of 8" to 12" as measured from the plane of the ceiling below. According to drawing C-182 and field measurements the floor of the Control Room is 16" thick. Therefore, acceptable seal thickness as measured from the plane of the floor above would be less than or equal to 8". Measurement to the penetration seal from the plane of the Control Room floor is 10" over approximately one half of the seal surface area. A corrective action program action request (CAP 31268) was generated to document this condition and track repair of this barrier opening. As a result of this discovery, this fire barrier penetration was declared inoperable on February 21, 2003 and hourly fire rounds were initiated on both sides of the affected barrier.

Repair of this penetration seal is being evaluated via corrective action CA 28277. As recommended in the original action item, this seal will either be removed and replaced with an appropriate design or built up to an acceptable depth by the addition of silicone foam material. We anticipate completing the restoration of this penetration by the end of May 2003.

IE22

Damaged HVAC Duct Flange


While performing an 18-month Appendix R fire barrier inspection, a HVAC duct flange located at penetration M-5-4-1-G was found damaged. The HVAC duct flange was found separated from the HVAC duct at the penetration opening. This flange is designed to close the expansion joint between fire damper sleeve and the fire barrier penetration opening. The 90° flange was found separated from the HVAC duct at the penetration. A corrective action program action request (CAP 31672) was generated to document this condition. In addition a Work Order (303654) has been generated to repair the degraded flange. As a result of this discovery, this fire barrier penetration was declared inoperable on March 17, 2003 and hourly fire rounds were initiated on both sides of the affected barrier.

As indicated above repair of this penetration seal is currently being planned via a work order. Engineering personnel have determined that this flange may be repaired, in accordance with its original design, by refastening it to the HVAC duct using steel sheet metal screws. This work is currently being planned and should be completed by the end of May 2003.

As is apparent from the discussions above, our FPER licensing commitment to provide a special report to the NRC within 30 days for those deficient fire penetrations which are not repaired or restored within seven days was exceeded. Although the appropriate compensatory fire rounds were initiated, and have been continued pending restoration of the fire barriers, the tracking of the special reports in our NP 10.1.1, "Tech Spec and Administrative LCO Action Condition Entry and Tracking," procedure was not properly identified. These tracking deficiencies were discovered on May 6, 2003, during the performance of an audit of our tracking program. Based on these delayed reports and other concerns we have identified, we have concluded that the tracking process needs improvements and we are taking both short term and long term actions to improve the process within our Corrective Action Program (CE 11377).

We apologize for any inconvenience our delay in submittal of this reports may have caused.

Sincerely,


A. J. Cayia
Site Vice President
CWK/kmd

cc: NRC Regional Administrator
NRC Resident Inspector

NRC Project Manager
PSCW