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 FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397  
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 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-007-00:on 890316,failure to comply w/fire protection  
 sys detector surveillance TS requirement.W/890413 ltr.  
 W/8 ltr.

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EXTERNAL: EG&G WILLIAMS,S	4 4	FORD BLDG HOY,A	1 1
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## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Washington Nuclear Plant - Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 3 9 17										PAGE (3) 1 OF 0 4																													
TITLE (4) Failure to Comply with Fire Protection System Detector Surveillance Technical Specification Requirement - Cause Indeterminate																																																	
EVENT DATE (5) MONTH DAY YEAR 0 3 1 6 8 9 8 9										LER NUMBER (6) YEAR SEQUENTIAL NUMBER REVISION NUMBER 0 0 7 0 0 0 4										REPORT DATE (7) MONTH DAY YEAR 1 3 8 9										OTHER FACILITIES INVOLVED (8) FACILITY NAMES DOCKET NUMBER(S) 0 5 0 0 0 0 0 0																			
OPERATING MODE (9) 1										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																																							
POWER LEVEL (10) 0 1 7 18										20.402(b) 20.405(a)(1)(i) 20.405(a)(1)(ii) 20.405(a)(1)(iii) 20.405(a)(1)(iv) 20.405(a)(1)(v)										20.405(c) 50.36(c)(1) 50.36(c)(2) 50.73(a)(2)(i) 50.73(a)(2)(ii) 50.73(a)(2)(iii)										50.73(a)(2)(iv) 50.73(a)(2)(v) 50.73(a)(2)(vi) 50.73(a)(2)(viii)(A) 50.73(a)(2)(viii)(B) 50.73(a)(2)(ix)										73.71(b) 73.71(c) OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
LICENSEE CONTACT FOR THIS LER (12)																																																	
NAME W.S. Davison, Compliance Engineer																				TELEPHONE NUMBER AREA CODE 510 9 317 171-12 1510 11																													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) X 2726																																																	
CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDOS										CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPDOS																																							
SUPPLEMENTAL REPORT EXPECTED (14)																																																	
YES (If yes, complete EXPECTED SUBMISSION DATE)																				NO.										EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR																			

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

On March 16, 1989, during a check of the Fire Protection System technical specification surveillance procedures, a plant maintenance engineer discovered that two technical specification surveillance procedures did not agree with the requirements of WNP-2 Technical Specification 3.3.7.9. During this check of the surveillance procedures two problems were found: 1) Fire Protection Zones 35 and 36, for Standby Service Water Pump Houses A and B, each contain one thermal fire detector and one ionization fire detector. Technical Specification Table 3.3.7.9-1 lists the required fire detectors for these two zones as being two ionization detectors in each zone. The surveillance procedure for these two zones agrees with the physical installation and does not agree with the Technical Specification requirement, 2) Power Generation Control Cabinet (PGCC) U679, located in the Main Control Room, contains seven ionization fire detectors. Technical Specification Table 3.3.7.9-1 lists the required number of fire detectors for PGCC U679 as eight. The surveillance procedure for this cabinet agrees with the physical installation and does not agree with the Technical Specification requirement. The areas in question were placed on a one hour fire tour. Corrective action will consist of doing a thorough walkdown of the areas covered by the Technical Specifications to discover additional areas of disagreement. Since an Amendment has been submitted to remove this portion of the Fire Protection System from the WNP-2 Technical Specifications, no attempt will be made to change the Technical Specifications. The current configuration provides sufficient detection for the areas monitored and therefore a modification is not necessary. No safety significance is associated with this event.

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

Plant Conditions

- a) Plant Mode - 1 (Power Operation)
- b) Power Level - 78%

Event Description

On March 16, 1989, during a check of the Fire Protection System technical specification surveillance procedures, a plant electrical maintenance engineer discovered that two technical specification surveillance procedures did not agree with the requirements of WNP-2 Technical Specification 3.3.7.9. During this check of the surveillance procedures the following two problems were found:

1. Fire Protection Zones 35 and 36, for Standby Service Water Pump Houses A and B, each contain one thermal fire detector and one ionization fire detector. Technical Specification Table 3.3.7.9-1 lists the required fire detectors for these two zones as being two ionization detectors in each zone. The surveillance procedure for these two zones agrees with the physical installation and does not agree with the Technical Specification requirement.
2. Power Generation Control Cabinet (PGCC) U679, located in the Main Control Room, contains seven ionization fire detectors. Technical Specification Table 3.3.7.9-1 lists the required number of fire detectors for PGCC U679 as eight. The surveillance procedure for this cabinet agrees with the physical installation and does not agree with the Technical Specification requirement.

Immediate Corrective Action

The requirements of WNP-2 Technical Specification 3.3.7.9 LCO Action Statement were implemented to declare the questionable fire detectors inoperable and place each of the associated Fire Protection Zones on a one hour fire tour.

Further Evaluation and Corrective ActionFurther Evaluation

1. The LER is written to document this event as reportable per the requirements of 10CFR50.73(a)(2)(i)(B) "Any operation or condition prohibited by the plant's Technical Specification ..."
2. Due to a lack of detailed historical information, the root causes for this event are indeterminate. The root cause investigation did, however, result in the identification of below listed contributing factors:
  - A. The design for the number and type of fire detectors for the Standby Service Water Pump Houses (SSWPPH) has not changed since 1982.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

This is well prior to the initial submittal of the WNP-2 Technical Specification. The March 1984 issue of Technical Specifications was in error since it listed in Table 3.3.7.9-1 that the requirement for the SSWPH fire detectors was two ionization detectors. The surveillance procedure has contained the correct information since its original issue.

- B. PGCC U679 in the Main Control Room was originally designed with seven ionization detectors. A General Electric design change (FDDR KK1-1120 Rev. 1) added an additional ionization detector and a thermal detector in May of 1983. A subsequent G.E. design change (FDDR KK1-1120 Rev. 6) removed these detectors in August of 1983, leaving "seven" as the correct number of ionization detectors designed for PGCC U679. In November of 1983 the number "eight" was incorrectly submitted as the number to be included in the submittal of WNP-2 Technical Specifications. Therefore, in December of 1983, the WNP-2 Technical Specification was issued with an incorrect number in Table 3.3.7.9-1 for PGCC U679 ionization detectors. The applicable Technical Specification Surveillance Procedure has contained the correct number of "seven" since its original issue in December of 1983.

3. There were no structures, components or systems that were inoperable at the start of this event that contributed to the event.

#### Corrective Actions

1. A walkdown of the Fire Protection System in the areas covered by the Technical Specifications has been conducted. No additional areas of disagreement between Technical Specifications, the designed configuration of the Fire Detection System, and the content of the Technical Specification Surveillance Procedures were discovered.
2. In light of the impending issuance of the Technical Specification Amendment which was submitted to remove the Fire Protection section from the WNP-2 Technical Specifications, no action will be taken to submit corrections to this section of the Technical Specification. These areas will be maintained on the Technical Specification fire tour until the pending Technical Specification Amendment is issued. At that time, they will be controlled via plant procedures.



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TEXT (If more space is required, use additional NRC Form 368A's) (17)

### Safety Significance

There is no safety significance associated with this event. Both of the conditions documented by this LER are the result of administrative errors in the writing of the WNP-2 Technical Specifications. The design configuration of the Fire Protection System was not impacted in any way. The safety of the plant equipment and personnel due to the Fire Protection System was maintained in compliance with the bases for the Technical Specifications during the entire period covered by this event as documented by the correct completion of the Fire Protection System Surveillance Procedures.

### Similar Events

LER 85-039 "Fuse Size Inconsistency With Technical Specifications" documents a condition during which it was discovered that the plant design and the installed configuration did not agree with the Technical Specification. The corrective actions for LER 85-039 were focused on the Plant Modification program and preventing emerging design changes from bypassing the Technical Specification update process. This LER (89-007) addresses the discovery of administrative errors in the initial writing of the WNP-2 Technical Specifications.

LER 88-036-01 "Failure to Perform Division One 4.16 KV Emergency Bus Undervoltage Degraded Voltage Protection Technical Specification Surveillance Due to Inadequate Procedure" documents a condition during which it was discovered that Technical Specification surveillance procedures did not contain all the testing requirements specified by the Technical Specifications. The corrective action focused on the correction of the specific procedures involved and the submittal of an emergency Technical Specification Amendment.

### EIIS Information

#### Text Reference

Thermal Fire Detector  
Ionization Fire Detector  
Power Generation Control Cabinet

#### EIIS Reference

System	Component
KP	DET
KP	DET
ID	CAB

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

Docket No. 50-397

April 13, 1989

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

Subject: NUCLEAR PLANT NO. 2  
LICENSEE EVENT REPORT NO. 89-007

Dear Sir:

Transmitted herewith is Licensee Event Report No. 89-007 for the WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the items 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:lg

Enclosure:  
Licensee Event Report No. 89-007

cc: Mr. John B. Martin, NRC - Region V  
Mr. C.J. Bosted, NRC Site (M/D 901A)  
INPO Records Center - Atlanta, GA  
Ms. Dottie Sherman, ANI  
Mr. D.L. Williams, BPA (M/D 399)

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