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SUBJECT: Advises that LER 85-020-00 re inoperable fire damper, determined not reportable & being withdrawn. Concludes that all specified compensatory actions per Tech Specs completed & events did not constitute unreviewed safety issues.

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Document Control Manager:

Based on an engineering evaluation, the event described in LER 50-316/85-20-00, Inoperable Fire Damper, was determined to be not reportable and the LER is being withdrawn.

An evaluation was made on the effect of the damper failure in the wall between the Battery Room and the Inverter Room in Unit 2 4KV switchgear area. This damper is located near the ceiling.

The failure of this damper will have minimal effect on the carbon dioxide fire protection system for the area. The system when designed, was for the following areas:

a) Transformer and Switchgear Area
b) Control Rod Drive Equipment Room
c) Battery Room
d) Battery Charging and D. C. Room (Inverter Room)

The total pounds of carbon dioxide required by calculation for this area was 4,369 lbs. to give a 50% concentration. The system design was 4,536 lbs. Concentration tests resulted in damage to battery cases and it was decided to remove the automatic carbon dioxide protection from the Battery Room. The quantity of carbon dioxide discharged in the remaining design areas would therefore have provided an even greater concentration. Thus, the system has a reserve capacity to help offset any loss into the Battery Room.

The damper in question, as noted above, is located near the ceiling of the Inverter Room. The only type combustible near the ceiling of the Inverter Room is cable insulation in conduit. Because CO_2 is heavier than air, leakage through the damper would have the greatest impact on the CO_2 concentrations at the Inverter Room ceiling. This relatively small leak path would not have prevented the automatic CO_2 fire protection system from controlling a fire in the Inverter Room.

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A fire in either area would alarm in the Control Room. The fire brigade would respond and take any further action necessary to suppress a fire in this area.

It is, therefore, concluded that at no time during the period when the fire damper was inoperative were the fire protection facilities incapable of containing and suppressing a fire in the above discussed fire areas.

As to damage of the battery cases, the original damage was due to chilling caused by direct discharge of liquid carbon dioxide on the cases. With no direct discharge in the room, any carbon dioxide entering the room would be a gas and, as such, not chill the battery cases to cause damage.

Therefore, based upon this evaluation it has been concluded that: 1) all specified compensatory actions per Technical Specification 3.7.10, were completed; 2) the subject events did not constitute an unreviewed safety question as defined in 10 CFR 50.59, nor did they create a significant hazard to the health and safety of the general public; and 3) the events are not reportable per 10 CFR 50.73.

LER 50-316/85-20-00 is being retracted, the LER number will not be re-issued. Please update your records accordingly.

Sincerely,

W. G. Smith, Jr.
Plant Manager

WGS:afh

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