



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

August 29, 1994

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

Gentlemen:

In the Matter of)	Docket Nos. 50-327
Tennessee Valley Authority)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - FACILITY OPERATING LICENSES
DPR-77 AND DPR-79 - TECHNICAL SPECIFICATION (TS) 3.7.12 - SPECIAL
REPORT 94-10

The enclosed special report provides details concerning electrical penetrations that are considered to be nonfunctional as fire barriers. Also, included in this report are details concerning a fire barrier door that has been intentionally removed from service. The fire barriers will be nonfunctional for a period of time greater than the TS allowable timeframe.

This report is being submitted in accordance with TS 3.7.12 Action Statement (a).

If you have any questions concerning this submittal, please telephone C. H. Whittemore at (615) 843-7210.

Sincerely,

R. H. Shell
Manager
SQN Site Licensing

Enclosure

cc: See page 2

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 SPECIAL REPORT 94-10

I. PENETRATIONS

Description of Condition

Beneath the floor of the main control room (MCR) is an area where electrical cables from the spreading room are gathered and then routed to the various MCR cabinets and panels. The cables are fed into this area through nine major penetrations from the spreading room. The area connecting the spreading room to the area beneath the MCR was designed to be one primary area and not different compartments and, as such, the penetrations between the two were not designed or constructed to the same qualifications as penetrations that are required to function as technical specification (TS) fire barriers. Typically, fire barriers covered by TSs are barriers that are required to allow safe shutdown of the plant in the event of an accident. The 10 CFR 50, Appendix R analysis has shown that the plant can be safely shutdown using the auxiliary control room. Therefore, based on compliance with Appendix R remote shutdown requirements, these MCR/spreading room area penetrations are not required to comply with SQN's TS 3/4.7.12 fire-barrier regulations. However, the drawings depicting the penetrations from the spreading room are not definitive in differentiating between the TS penetrations and the non-TS penetrations. The subject penetrations connecting the spreading room to the MCR are not qualified as TS fire barriers and were identified during a plant-wide examination and review of penetrations in response to NRC Inspection and Enforcement (IE) Notice 88-04.

Cause of Condition

The MCR floor penetrations in question do not have adequate documentation to establish the penetrations as non-TS fire barriers. Current design drawings of the MCR/spreading room do not provide sufficient detail to enable non-fire protection personnel to distinguish between fire barriers that are covered by TS requirements and fire barriers that are not. Therefore, all the penetrations in the floor of the MCR could possibly be interpreted as being subject to the TS requirements. However, TVA has concluded that the MCR and the spreading room area are considered one fire area and are not meant to be different compartments.

Corrective Action

In accordance with Limiting Condition for Operation (LCO) 3.7.12 Action Statement (a), a roving fire patrol was established after the fire detectors on one side of the penetration were verified operable. The fire patrol will be maintained until the MCR floor is officially designated and appropriately documented as a non-TS fire barrier. This will be accomplished by a review and update of the compartmentation drawings to explicitly differentiate between TS and non-TS barriers. The corrective action for this task was previously scheduled under another corrective action program.

II. FIRE DOOR A-9

Description of Condition

On August 2, 1994, with Unit 2 shutdown for the Cycle 6 refueling outage (RFO), the fire barrier door noted above was breached to support the Unit 2 Cycle 6 RFO activities. The fire barrier door will be breached in excess of the TS allowable time period. This condition is being reported in accordance with TS Action Statement 3.7.12(a).

Cause of Condition

The fire barrier door is in the auxiliary building on Elevation 653.0, serving entrance to the 2B-B residual heat removal pump room. The fire door was breached to facilitate the movement of equipment and personnel into and out of the room during the replacement of the pump motor.

Corrective Action

In accordance with LCO 3.7.12 Action Statement (a), a roving fire patrol was established after the fire detectors on one side of the fire barrier were verified operable. The roving fire patrol will be maintained until the breach is removed and the fire barrier is reestablished.