

Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877-7279

J. T. Beckham, Jr.  
Vice President—Nuclear  
Hatch Project



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

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
SPECIAL REPORT 1-91-008  
MISSED SURVEILLANCE ON SUPPRESSION SYSTEMS  
FLOODING VALVES RESULTS IN SPECIAL REPORT  
AS REQUIRED BY FIRE HAZARDS ANALYSIS

Gentlemen:

In accordance with the Unit 1 and Unit 2 Technical Specifications and the Fire Hazards Analysis (FHA), Georgia Power Company is submitting the enclosed Special Report concerning missed surveillances on sprinkler systems flooding valves. This event occurred at Plant Hatch - Unit 1 and 2.

Sincerely,

J. T. Beckham, Jr.

JKB/cr  
002472

Enclosure: Special Report 1-91-008

cc: Georgia Power Company  
Mr. H. L. Sumner, General Manager - Nuclear Plant  
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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ENCLOSURE

PLANT HATCH - UNITS 1 AND 2  
NRC DOCKETS 50-321 AND 50-366  
OPERATING LICENSES DPR-57 AND NPF-5  
SPECIAL REPORT 1-91-008  
MISSED SURVEILLANCE ON SUPPRESSION SYSTEMS FLOODING  
VALVES RESULTS IN A SPECIAL REPORT  
AS REQUIRED BY THE FIRE HAZARDS ANALYSIS

A. REQUIREMENT FOR REPORT

This report is required by Unit 1 and Unit 2 Technical Specifications Section 6.9.2 which states, "Special Reports for fire protection equipment operating and surveillance requirements shall be submitted, as required, by the Fire Hazards Analysis and its Appendix B requirements."

Fire Hazards Analysis (FHA) Appendix B, Section 1.4.1, states, "The spray and/or sprinkler systems in Tables 1.4-1 and 1.4-2 in Appendix B shall be OPERABLE." Section 2.4.1.c.1 requires that these sprinkler systems be tested once per 18 months by performing a simulated automatic actuation of the system. In this event, it was found that four suppression system flooding valves were not being surveilled as required, therefore, a Special Report is required.

B. UNIT STATUS AT TIME OF EVENT

On 10/14/91, Unit 1 was in a refueling outage with the vessel cavity flooded and all fuel removed from the vessel. Unit 2 was in the Run mode at a power level of 2432 CMWT (approximately 100 percent rated thermal power).

C. DESCRIPTION OF EVENT

On 10/14/91, non-licensed Maintenance personnel were conducting the sprinkler system trip test on Unit 2 fixed water suppression systems, 2Z43112W13 and 2Z43130W23, in accordance with procedure 42SV-FPX-016-2S, "Sprinkler System Surveillance Safety Related Areas." This semiannual test is performed to meet the requirements of FHA Appendix B, Section 2.4.1.c.1, which states that each of the spray and/or sprinkler systems listed in Tables 1.4-1 and 1.4-2 in Appendix B, shall be demonstrated operable by performing a system functional test which includes simulated automatic actuation of the system. This is accomplished by performing testing and inspection of the valves, alarms and the actuator in the suppression system.

During performance of that test, the personnel noted that testing of two of the flooding valves, 2Z43-F201 and -F205, in the systems was not addressed in procedure 42SV-FPX-016-2S, and therefore, these valves were not being surveilled as required. Deficiency Cards (DCs) 2-91-4153 and -4154 were written on 10/14/91 to document the procedural deficiencies and

ENCLOSURE (Continued)

MISSED SURVEILLANCE ON SUPPRESSION SYSTEMS FLOODING  
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non-performance of the required surveillance on the subject valves. On 10/14/91, at 1440 CDT, licensed Control Room personnel declared these valves inoperable, initiated Limiting Condition for Operation (LCO) 2-91-673, and established a continuous fire watch with backup fire suppression equipment for the affected fire areas, 2003 and 2023, in accordance with FHA Appendix B, Section 1.4.1, Action a.

While investigating for the cause of the above deficiencies, on 10/16/91, non-licensed Nuclear Safety and Compliance (NSAC) personnel identified a similar concern in Unit 1 fixed water suppression system, 1Z43112W02. Flooding valve 1Z43-F019A in the system was not included in procedure 42SV-FPX-016-1S and thus was not being tested as required. DC 1-91-4845 was written to document the condition and licensed Control Room personnel were notified. Subsequently, LCO 1-91-662 was initiated on 10/16/91 at 1435 CDT, and a continuous fire watch was established for fire area 1003.

As a result of the above findings, fire protection engineering personnel performed a detailed review of the subject procedures for similar deficiencies and conducted a plant walkdown of both units' fire suppression systems as listed in FHA Appendix B, Tables 1.4-1 and 1.4-2. Consequently, another flooding valve, 1T43-F002E, in Unit 1 fire suppression system 1T43087W06, was identified as not being tested. DC 1-91-5006 was written and licensed Control Room personnel were notified. Subsequently, LCO 1-91-693 was initiated and a continuous fire watch was established for fire area 1205Z, on 10/22/91, at 1425 CDT. No additional deficiencies were identified in the Unit 2 suppression systems by this review.

Procedures 42SV-FPX-016-1S and -2S were temporarily revised on 10/22/91 and 10/16/91, respectively, to include testing and inspection of the subject flooding valves. The Unit 1 procedure was performed satisfactorily on the affected valves on 10/23/91. The Unit 2 procedure was performed satisfactorily on the affected valves on 10/16/91. No problems were noted during performance of these procedures. The subject LCOs were terminated.

D. CAUSE OF EVENT

The cause of this event is a less than adequate procedure. Procedures 42SV-FPX-016-1S and -2S failed to include testing and inspection of the subject flooding valves as required by the FHA. As a result, these valves had not been surveilled at the required periodicity. A review of the history of these procedures showed that these discrepancies existed since 1986 when the subject procedures were first issued.

ENCLOSURE (Continued)

MISSED SURVEILLANCE ON SUPPRESSION SYSTEMS FLOODING  
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E. ANALYSIS OF EVENT

Upon being informed of the discrepancies, licensed personnel declared the affected flooding valves inoperable and established a continuous fire watch with backup fire suppression equipment for the affected fire areas as required by FHA Appendix B, Section 1.4.1, Action a.

Each of the affected fire areas, 1003, 2003 and 2023, is equipped with a full coverage, automatic deluge suppression system activated by a pilot air header. Activation of the deluge system will result in both local and Main Control Room alarms. In fire area 1205Z, actuation of a wet pipe sprinkler suppression system results in an alarm both locally and in the Main Control room. These alarms are tested once every six months per procedures 42SV-FPX-016-1S and -2S. In this event, inspection of the subject flooding valves was performed subsequent to identification of the procedural deficiencies. The valves were found to be operating satisfactorily. Since the valves were operable at the time they were tested and inspected it is reasonable to assume the valves were operable before that time and would have actuated if called upon to do so. Thus, it is concluded that had a fire occurred in the affected fire areas, it would have been promptly detected and extinguished.

Based on the above analysis, it is determined that this event had no adverse impact on nuclear safety.

F. CORRECTIVE ACTIONS

1. Procedures 42SV-FPX-016-1S and -2S were temporarily revised on 10/22/91 and 10/16/91, respectively, to incorporate testing and inspection of the subject flooding valves. A permanent revision to these procedures will be made effective by 11/29/91.
2. A detailed review of the subject procedures and a plant walkdown was conducted to determine if similar deficiencies existed. As stated in this report, the review resulted in identification of an additional valve which had not been tested.
3. The flooding valves addressed in this report were tested and inspected per the revised procedures, 42SV-FPX-016-1S and -2S, on 10/23/91 and 10/16/91, respectively. The valves were found to be operating satisfactorily.