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File with electric system

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

PLANT HATCH - UNIT 2  
NRC DOCKET 50-366  
OPERATING LICENSE NPF-5  
SPECIAL REPORT 2-92-001  
MISSED SURVEILLANCE ON WATER CURTAIN  
ISOLATION VALVE RESULTS IN SPECIAL REPORT  
AS REQUIRED BY FIRE HAZARDS ANALYSIS

Gentlemen:

In accordance with the Unit 2 Technical Specifications and the Fire Hazards Analysis (FHA), Georgia Power Company is submitting the enclosed Special Report concerning a missed surveillance on a water curtain isolation valve. This event occurred at Plant Hatch - Unit 2.

Sincerely,

  
W. G. Hairston, III

JKB/cr

Enclosure: Special Report 2-92-001

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 - UNIT 2  
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A. REQUIREMENT FOR REPORT

This special report is required by the Plant Hatch Unit 2 Technical Specifications section 6.9.2 and the Plant Hatch Fire Hazards Analysis (FHA), Appendix B, section 1.4.1. Specifically, Unit 2 Technical Specifications section 6.9.2 requires that special reports for fire protection equipment operating and surveillance requirements shall be submitted, as required, by the FHA and its Appendix B requirements.

FHA Appendix B, section 1.4.1, requires that spray and/or sprinkler systems listed in Appendix B Table 1.4-2 to be operable. Action statement b of section 1.4.1 requires an inoperable spray and/or sprinkler systems to be restored to operable status within 14 days or a special report be submitted to the NRC within the next 30 days. Section 2.4.1.b requires the spray and/or sprinkler systems to be verified operable by cycling each testable valve in the flow path through at least one complete cycle of full travel and verifying proper operation of electrical supervision of monitored valves at least once every 12 months.

On 3/11/92, it was discovered that the required surveillance on a testable valve in a spray system listed in Appendix B Table 1.4-2 had not been performed at the required frequency. The affected spray system, therefore, was inoperable. At the time of the discovery of the missed surveillance, more than 14 days had elapsed since the required surveillance date had passed; consequently, a special report is required by FHA Appendix B and Unit 2 Technical Specifications section 6.9.2.

B. UNIT STATUS AT TIME OF EVENT

On 3/11/92 at 0950 CST, Unit 2 was in the Run mode at an approximate power level of 2436 CMWT (100% rated thermal power).

C. DESCRIPTION OF EVENT

On 3/11/92, site Safety Audit and Engineering Review (SAER) personnel were performing a routine audit of plant fire protection activities. At that time, they determined that the annual surveillance on Unit 2 Reactor Building N.E. 185' Elevation Water Curtain isolation valve 2T43-F451AP had

ENCLOSURE (Continued)

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not been performed. This valve is required by the FHA, Appendix B, section 2.4.1.b, to be cycled through at least one complete cycle of full travel at least once per 12 months. The proper functioning of the valve's electrical supervision, i.e., tamper alarm, also is required by section 2.4.1.b to be verified at least once per 12 months.

The due date for performance of the required surveillance on valve 2T43-F451AP and its tamper alarm was 9/12/91. With the 25% grace period allowed by the FHA, Appendix B, the last possible date for performing the surveillance was 12/11/91. SAER personnel reviewing the last completed surveillance data package from procedure 42SV-FPX-035-2S, "Fire Protection Valve Cycling Surveillance," determined that the surveillance on valve 2T43-F451AP had not been performed by 12/11/91.

The section of procedure 42SV-FPX-035-2S which provided instructions for cycling the valve and verifying the proper operation of its tamper alarm was marked as not applicable and, thus, not performed. It appears that it was marked as such because the valve's Master Parts List (MPL) identification number was incorrectly listed in the procedure. The MPL number was listed as 2T43-F461AP instead of the correct 2T43-F451AP. Other information, such as the location, tamper switch MPL number, and associated spray system was correctly listed in the procedure. Additionally, the valve was labeled with a description of its function, including associated fire zone, which did match the information given in the procedure. The personnel performing the procedure submitted a Deficiency Card on 10/18/91 documenting the incorrect MPL number and other inaccuracies in the procedure.

Because some steps of procedure 42SV-FPX-035-2S were not performed, the surveillance was marked by personnel performing it as unacceptable on 12/11/91, the last day for performing the surveillance. However, there is no record Operations personnel were notified of the unacceptable condition as required by the procedure. The line in the data package indicating the Unit 2 Shift Supervisor was notified of the unacceptable condition was left blank. Also, there was no indication in the Shift Supervisor's log that he had been notified. Because Operations personnel were not aware the surveillance on valve 2T43-F451AP had not been performed, the associated spray system was not declared inoperable as it should have been on the basis of the missed surveillance, and the actions required by the FHA, Appendix B, section 1.4.1, were not taken.

## ENCLOSURE (Continued)

### MISSED SURVEILLANCE ON WATER CURTAIN ISOLATION VALVE RESULTS IN SPECIAL REPORT AS REQUIRED BY THE FIRE HAZARDS ANALYSIS

On 3/11/92, SAER personnel documented their findings on a Deficiency Card. Operations personnel were notified of the missed surveillance and, at 0950 CST, they declared the Unit 2 Reactor Building N.E. 185' Elevation Water Curtain inoperable per the requirements of section 1.4.1. Limiting Condition for Operation (LCO) 2-92-175 was initiated. A continuous fire watch with backup fire suppression equipment was established within one hour as required by action statement a of section 1.4.1. By 1425 CST, the required surveillance had been performed satisfactorily on valve 2T43-F451AP and its tamper alarm per procedure 42SV-FPX-035-2S, the Unit 2 Reactor Building N.E. 185' Elevation Water Curtain had been declared operable, and LCO 2-92-175 had been terminated.

#### D. CAUSE OF EVENT

This event was caused by a less than adequate procedure and personnel error.

The procedure was less than adequate because it listed the wrong MPL number for valve 2T43-F451AP. It has been incorrect since it was issued as Revision 0 on 6/14/89. Also, the procedure contained other fire protection valves serving sprinkler systems not required by FHA Appendix B. Some of these valves are located in high radiation areas and are not checked until conditions allow. Consequently, portions of the procedure are sometimes not performed by the last day of the annual surveillance interval and it is not unusual for the procedure to be marked unacceptable as a result. This makes it difficult to determine when an unacceptable condition is one that requires fire protection components to be declared inoperable and actions to be taken per the FHA, Appendix B.

A personnel error occurred in that personnel performing the procedure failed to inform Operations personnel that the surveillance on valve 2T43-F451AP had been missed. As a result, compensatory actions required by the FHA, Appendix B, were not implemented.

#### E. ANALYSIS OF EVENT

Valve 2T43-F451AP is the manual isolation valve to the Unit 2 Reactor Building N.E. 185' Elevation Water Curtain. It is a locked open, monitored valve. Its tamper switch will cause an alarm in the Main Control Room if the valve is moved from its fully open position. In this event, the FHA required surveillance on the valve and its tamper alarm was not performed per section 2.1.4.b of Appendix B. It should have been performed by

ENCLOSURE (Continued)

MISSED SURVEILLANCE ON WATER CURTAIN  
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12/11/91, but was not. Also, the requirements for an inoperable spray system were not taken when the valve and tamper alarm surveillance was missed.

Upon discovery of the missed surveillance, the required actions were taken and the surveillance was performed successfully. This was performed on 3/11/92. A review of maintenance history for both the valve and its tamper switch revealed no Maintenance Work Orders against either the valve or the switch since the last time the surveillance was performed on 9/25/90. Since the valve and its tamper switch passed the surveillance on 3/11/92 and no work has been performed on either one since the last successful performance of the surveillance, it is reasonable to conclude that the valve and tamper switch were always operable and capable of performing their intended function.

Based on the above, it is concluded that this event had no adverse effect on nuclear safety.

F. CORRECTIVE ACTIONS

On 3/11/92, Operations personnel were notified of the missed surveillance and, at 0950 CST, they declared the Unit 2 Reactor Building N.E. 185' Elevation Water Curtain inoperable per the requirements of section 1.4.1. Limiting Condition for Operation (LCO) 2-92-175 was initiated and a continuous fire watch with backup fire suppression equipment was established within one hour. By 1425 CST, the required surveillance had been performed satisfactorily on valve 2T43-F451AP and its tamper alarm per procedure 42SV-FPX-035-S2. The Unit 2 Reactor Building N.E. 185' Elevation Water Curtain was declared operable, and LCO 2-92-175 was terminated.

Procedure 42SV-FPX-035-2S has been revised to correct the MPL number for valve 2T43-F451AP. The revised procedure has been approved for validation and was used to perform the required surveillance on 3/11/92.

Involved personnel have been counseled regarding their inappropriate actions.

Procedures 42SV-FPX-035-1S, "Fire Protection Valve Cycling Surveillance," and 42SV-FPX-035-2S will be revised to identify more clearly those valves and tamper switches which must be tested to meet the annual surveillance requirements of FHA Appendix B. This action will be completed prior to the next scheduled surveillance per these procedures.