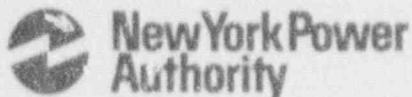


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November 9, 1992
JAEP-92-0782

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
NON-FUNCTIONAL FIRE BARRIER DOORS

Dear Sir:

The New York Power Authority (NYPA) submits the following special report to address deficiencies associated with a number of fire barrier doors. Due to the nature and number of deficiencies, the doors were not restored to meet all of the design requirements within the seven days allowed. As a result, a special report is required by Technical Specification 3.12.F.2 and 6.9.B.2.

SUMMARY OF EVENT

Fire doors installed in BTP 9.5-1, Appendix A or 1. CFR50, Appendix R fire barriers were declared non-functional (inoperable) when they failed to meet one or more visual inspection, functional test or mechanical clearance acceptance criteria during surveillance. Repairs or modifications to restore the doors to a functional (operable) status were not completed within the seven day period allowed by Technical Specification 3.12.F.2.

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DESCRIPTION OF EVENT

A surveillance of fire doors was initiated using a recently revised surveillance test procedure that included specific detailed criteria for visual inspection, functional test and mechanical clearances. The surveillance test acceptance criteria was based on National Fire Protection Association (NFPA) and Underwriters Laboratory standards for fire doors and included, but was not limited to, criteria such as those shown below.

1. Visual Inspection

- Door not physically blocked
- Door hardware secure
- Test laboratory (UL or similar) label in place and legible
- Door properly identified

2. Functional Test

- Door closes when released
- Door latches when closed
- Door position indication on remote panels functions properly

3. Mechanical Clearances

- Swinging door to door frame minimum and maximum clearance
- Sliding door to wall clearance
- Sliding door overlap on wall (or frame) in closed position
- Door to door sill clearance

Inspection of fire doors using the revised surveillance test procedure began on October 2, 1992. Fire watches were posted (or existing fire watch post instructions were revised) to meet the requirements of Technical Specification 3.12.F.2 as the fire doors were declared non-functional if they failed to meet one or more of the acceptance criteria. The number of deficiencies requiring correction exceeded the ability of the engineering and maintenance staff to restore the doors to a functional status within seven days of discovery of the deficiencies. As a result, a special report is required by Technical Specification 3.12.F.2 and 6.9.B.2 to inform the NRC of plans to restore the doors to a fully functional status.


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CORRECTIVE ACTION

1. A continuous or roving patrol fire watch was posted (or existing fire watch post instructions modified) within one hour of the discovery of conditions which resulted in a fire door being declared non-functional. The fire watch will remain posted until the fire door of concern is restored to a functional status.
2. Each fire door is being restored to a functional status by repair, modification, or (consistent with the guidance contained in Generic Letter 86-10) justification of the existing condition based on an evaluation of the deficiency, a hazards analysis for the area of concern, and conservative fire protection engineering judgement.
3. As of November 9, 1992, 77 doors remained non-functional. All of the doors are expected to be restored to a functional status prior to plant startup or the compensatory action fire watch will remain posted until the doors are restored to a functional status.

If you have any questions concerning this matter, please contact W. Verne Childs at (315) 349-6071.



HARRY P. SALMON, JR.

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