

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Peach Bottom Atomic Power Station - Unit 3	0150100121718	1 OF 014

TITLE (4)

Degraded Fire Barriers

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)																
MONTH	DAY	YEAR	YEAR	SEQUENCE NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER (8)															
0	6	2	0	8	5	8	5	0	1	1	0	2	1	0	0	1	8	5	0	5	0	0	0	1	1

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 51 (Check one or more of the following) (11)									
POWER LEVEL (10)	0,3,0	20.402(a)	20.406(a)	60.736(a)(2)(iv)	73.716(a)						
		20.406(a)(1)(i)(ii)	60.34(a)(1)	60.736(a)(2)(v)	73.716(a)						
		20.406(a)(1)(i)(iii)	60.34(a)(2)	60.736(a)(2)(vi)	OTHER (Specify in Abstract below and in Test, NRC Form 304A)						
		20.406(a)(1)(i)(iv)	X 60.736(a)(2)(ii)	60.736(a)(2)(vii)(A)							
		20.406(a)(1)(i)(v)	60.736(a)(2)(iii)	60.736(a)(2)(vii)(B)							
		20.406(a)(1)(i)(vi)	60.736(a)(2)(iv)	60.736(a)(2)(viii)							

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME	AREA CODE		
W. C. Birely, Senior Engineer - Licensing Section	215	8411-5048	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	
				N							

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)							
X NO							

ABSTRACT (Summarize in 1000 words, i.e., approximately fifteen single-space typewritten lines) (16)

Abstract: 3-85-11 - Revision 2

On June 21, 1985, it was discovered that a Technical Specification required fire watch was not established for fire barriers between the Main Steam Isolation Valve (MSIV) Room and the Torus Room. The fire watch was required because the MSIV Room floor is a fire barrier and it was degraded due to a lack of qualified penetration seals. Upon completion of the fire barrier upgrade program performed to bring the plant into compliance with 10 CFR 50, Appendix R, this floor was not identified as a fire barrier. Technical Specifications require fire watches in areas with degraded fire barriers. When this oversight was discovered and station personnel were informed, an hourly fire watch was established and the smoke detectors in the Torus Room were proven operable.

In addition, a complete review of penetration drawings was conducted. After this review, an inspection of certain barriers identified two additional degraded barriers. Appropriate fire watch patrols were established for these barriers in accordance with the Technical Specifications.

This revision to an LER originally submitted July 22, 1985 and revised on August 5, 1985 identifies the discovery of the two additional degraded barriers.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMS NO. 3150-0104

EXPIRES 8/31/85

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TEXT (If more space is required, use additional NRC Form 366a (17))

Description of the Event:

On June 21, 1985 it was discovered that Peach Bottom Unit 3 was not in compliance with Technical Specification 3.14.D.3 which requires that a fire watch be established if a fire barrier, separating portions of safety related systems required for safe shutdown is degraded. This Technical Specification became applicable on September 15, 1984. The MSIV room floor was not identified as a fire barrier on the design drawings used to isolate safe shutdown areas. Questions about the floor arose in March, 1985 and it was determined that the floor was a fire barrier in April, 1985. The floor does not contain qualified penetration seals and therefore is considered degraded. Due to administrative oversight, Peach Bottom staff was not informed of this deficiency until June 21, 1985 at which time smoke detection in the Torus Room was proven operable and an hourly fire watch patrol was established.

A complete review of fire area drawings was conducted. After this review, an inspection of certain barriers identified two additional degraded barriers due to lack of qualified penetration seals on September 3, 1985. One barrier separates the Containment Atmosphere Dilution (CAD) building from the Unit 2 reactor building. The other barrier separates elevation 195' of the Unit 2 reactor building from elevation 195' of the turbine building. Hourly fire watch patrols were established for these fire barriers immediately following identification of these two degraded barriers.

Consequence of the Event:

Operable smoke detectors in the reactor building would have provided early detection in the event of a fire. In addition, because these areas are not normally travelled, there is little possibility of significant amounts of combustibles being brought into them. The fire loads for fixed combustibles in these areas are negligible.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104
EXPIRES 8/31/85

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TEXT (if more space is required, use additional NRC Form 365A's) (17)

Cause of Event:

The event was caused by an error in design drawings and compounded by a personnel oversight. The design drawings did not include the MSIV Room floor as a barrier and the review of these drawings did not discover the error. The delay in reporting was caused by administrative oversights. The responsible engineer realized the floor was inadequate in March; however, the Technical Specification implications were not realized until June, 1985 at which time the site was notified.

Corrective Actions:

An hourly fire watch patrol has been established for the torus room. The penetrations in Unit 3 will be sealed during the present refueling outage. The penetration seal drawings have been corrected and reissued.

Hourly fire watch patrols have been rerouted to include the areas separated by the CAD building/Unit 2 reactor building barrier and the areas separated by the Unit 2 reactor building 195' elevation/turbine building 195' elevation barrier. The penetrations in the barrier separating the CAD building and Unit 2 reactor building will be sealed. A request for exemption from the requirements of 10 CFR 50, Appendix R, Section III.G.2, has been submitted via letter, J. W. Gallagher, PECO, to H. L. Thompson, Jr., USNRC, dated September 24, 1985 concerning the barrier between the Unit 2 reactor building elevation 195' and the turbine building elevation 195'. The proposed exemption requests that the wall at elevation 195' be considered equivalent to a three-hour barrier for purposes of separating two fire areas, due to a combination of design features and low combustible loadings.

In Revision 1 of this LER, it was reported that a complete review had been conducted of the penetration sealing drawings and that no similar discrepancies existed. The print review was completed on July 29, 1985; however, a post-print review walkdown of several suspect barriers had not yet been performed when Revision 1 was submitted. This walkdown, which occurred on September 3, 1985, identified the two additional degraded barriers discussed above.

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To improve evaluation of issues relating to Technical Specifications, a memorandum was distributed to engineers working on nuclear projects. The process of determining Technical Specification implications was discussed in this memorandum and the importance of this issue was reiterated.

Previous Similar Occurrences

This is a revision to an LER submitted July 22, 1985 and updated on August 5, 1985.

PHILADELPHIA ELECTRIC COMPANY

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P.O. BOX 3699

PHILADELPHIA, PA. 19101

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October 1, 1985

Docket No. 50-278

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 3

This revised supplement to a previously submitted LER concerns degraded fire barriers. Revisions are indicated by a vertical bar in the margin.

Reference:	Docket 50-278
Report Number:	3-85-11
Revision Number:	02
Event Date:	June 21, 1985
Report Date:	October 1, 1985
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i).

Very truly yours,



W. T. Ullrich
Superintendent
Nuclear Generation Division

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
T. P. Johnson, PB NRC Resident Inspector

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