NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Nine Mile Point Unit I	0 5 0 0 0 2 2 0	1 OF 0 3

TITLE (4)

Failure to Submit Special Fire Report

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
										0 5 0 0 0
0 2	2 0	8 4	8 4	-- 0 1 9	— 0 0	0 8	2 1	8 5		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
0 8 8		20.405(a)(1)(ii)	XX 50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	XX 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Robert G. Randall, Supervisor Technical Support	AREA CODE 3 1 5 3 4 9 - 2 4 4 5

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

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

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

ABSTRACT

On July 22, 1985 several Occurrence Reports were discovered that were initiated in early 1984. Four of the occurrence reports were for fire detection and suppression equipment which were out of service for more than 14 days. Sections 3.6.6 and 3.6.8 of the Nine Mile Point Tech. Specs. require that a special report be submitted within 30 days following the 14 day limit. Since the Occurrence Reports were just discovered, the 30 day special report was not submitted within the required time frame from the date of discovery.

Corrective actions involved a review of the methods used to initiate, review, track and close out occurrence reports. This program was found to be adequate. The events which led to the above described incident were a result of personnel deviating from the established program. The appropriate personnel were reinstructed as to the necessity to follow the program and advised of the potential consequences of not adhering to it.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Nine Mile Point Unit I	0 5 0 0 0 2 2 0	8 4	— 0 1 9	— 0 0	0 2 OF 0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

TEXT

On July 22, 1985 twenty-four occurrence reports were discovered that were initiated during February and April 1984. Twenty of these Occurrence Reports identified fire barrier penetrations that were inoperable for more than 14 days while the remaining four similarly identified fire detection and suppression equipment. Technical Specifications 3.6.6, 3.6.8 and 3.6.10.1 require the submittal of a 30 day special report for any fire detection, suppression or penetration equipment that is declared inoperable for more than 14 days. Since the Occurrence Reports identifying this equipment were not discovered until recently, the 30 day reports were not submitted.

The twenty penetration Occurrence Reports fall under the category of events reported in LER 83-44 and, therefore, do not require a separate report. The remaining four Occurrence Reports, however, were not previously identified and are, therefore, identified herein.

Of the four remaining Occurrence Reports, two involved inoperable fire suppression equipment and the other two involved inoperable fire detection equipment. On February 5, 1984, an oil leak was discovered which ran along cables between the auxilary control room and the cable spreading room. In order to correct this problem the fire suppression systems for these two rooms were marked up for personnel safety. A continuous fire watch was established in each of these rooms to provide the necessary suppression function. The oil leak was subsequently repaired and the fire suppression equipment returned to service on March 13, 1984. There were no potential safety consequences associated with the fire suppression systems being marked up since the continuous fire watch provided the required fire protection function.

With respect to the remaining two Occurrence Reports, fire detection equipment was marked up on April 2 and 6, 1984 in order to perform NRC committed modifications in the areas. A fire patrol was established to perform the necessary fire detection function. The detection equipment was subsequently returned to service on June 12, 1984. As with the fire suppression equipment, there were no potential safety consequences since the fire detection function was fulfilled.

ASSESSMENT OF SAFETY CONSEQUENCES

There were no potential safety consequences due to this incident since the appropriate fire protection activities were in effect. A fire watch was established in each area containing an inoperable fire protection component. The fire watch assumed the function of the inoperable component and provided adequate protection of safety-related equipment. Therefore, the public health and safety was not compromised.

CORRECTIVE ACTION

Corrective actions involved a review of the methods used to initiate, review, track and close out occurrence reports. This program was found to be adequate. The events which led to the above described incident were a result of personnel deviating from the established program. The appropriate personnel were reinstructed as to the necessity to follow the program and advised of the potential consequences of not adhering to it.

NIAGARA MOHAWK

NMP-13401

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August 21, 1985

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

RE: Docket No. 50-220
LER 84-19

Gentlemen:

In accordance with 10 CFR 50.73 we hereby submit the following Licensee Event Report:

LER 84-19 Which is being submitted in accordance with 10 CFR 50.73 (a)(2)(i), "Any operation or condition prohibited by the plant's Technical Specifications."

In addition, to avoid duplication of reports the attached LER contains the required information which would be included in a fire protection special report. As such, a fire protection special report will not be submitted for this particular incident.

The attached report was completed in the format designated in NUREG-1022, dated September 1983.

Very truly yours,

Thomas E. Lempges

Thomas E. Lempges
Vice President
Nuclear Generation

TEL/tg
cc: Dr. Thomas E. Murley
Regional Administrator

Attachment

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