

APPENDIX A  
NOTICE OF DEVIATION

Long Island Lighting Company  
Shoreham Nuclear Power Station

Docket No. 50-322  
License No. CPPR-95

As a result of an inspection conducted on December 3-7, 1984, the following deviations from licensee commitments were identified:

- A. The Fire Hazard Analysis Report (FHAR), Revision 1, dated June 1982 (an enclosure to your letter to NRC dated August 6, 1982), Section 1, Paragraph E.1.a., describes the licensee commitment to design the fire detector systems in the Reactor Building in accordance with NFPA 72D/E.

Contrary to the above, your design does not conform to NFPA 72D/E, in that the number of detectors per square foot of floor space has not been met; the maximum distance between individual detectors is exceeded (120 feet instead of 30 feet); and the location of detectors relative to ceilings does not conform to NFPA 72 D/E.

- B. The FHAR, Revision 1, Section 1, Paragraph D.1.j., describes the licensee commitment to provide fire doors having a fire resistance rating at least equal to the required rating of the barriers in which the doors are located.

Contrary to the above, the resistance rating of a significant number of fire doors in the plant is less than the rating of fire barriers in which they are located in that the fire doors have been degraded due to their modifications for security reasons.

- C. The FHAR, Revision 1, Section 1, Paragraph E.2.c., describes the licensee commitment to separate the diesel and electric fire pumps and their associated components by a 3 hour fire barrier.

Contrary to the above, the cables from the diesel fire pump controller and day tank pumps are routed through the same fire area as the electric fire pump, thereby not meeting the required 3 hour fire barrier separation.

- D. The FHAR, Revision 1, Section 1, Paragraph D.1.j., describes the licensee's commitment to provide an adequately rated fire damper where a ventilation duct penetrates a fire wall.

Contrary to the above, no fire damper is provided in the ventilation duct penetrating the 2 hour fire wall between the HVAC and chiller rooms at elevation 44 feet.

- E. The FHAR, Revision 1, Section 1, Paragraph E.5., describes the licensee commitment to design the Carbon Dioxide Suppression Systems in accordance with NFPA 12.

Contrary to the above, the Acceptance Test results for such systems in the Battery Rooms and Cable Tunnel indicate that the design objective was not achieved in that the carbon dioxide design density was not achieved at the highest test point.

- F. The FHAR, Revision 1, Section 1, Paragraph E.5., describes the licensee commitment to design the Carbon Dioxide Suppression systems in accordance with NFPA 12.

Contrary to the above, the design criteria for such system in the Computer Room is not met in that the fire detectors which actuate the system are located above the suspended ceiling and such location would prevent timely successful actuation of the system if a fire occurred.

- G. The FHAR, Revision 1, Section 1, Paragraph D.1.j., describes the licensee commitment to provide a minimum of 3 hour fire rating for ceiling/floor assemblies.

Contrary to the above, such protection was not maintained for the structural steel which forms a part of the ceiling/floor assemblies in the charcoal filter room and chiller room in that their fireproofing protection ("pyrocrete" coating) was found damaged at elevation 63 feet.

- H. Supplement 1 to the Shoreham Safety Evaluation Report, Section 9.5.4, documents the licensee commitment to install self-contained 8 hour battery pack emergency lighting in all areas of the plant which could be manned to bring the plant to a safe cold shutdown.

Contrary to the above, such lighting in several such areas in the Reactor Building was not installed. (see Inspection Report 50-322/84-46, Paragraph 8.b. for exact locations).

Long Island Lighting Company is hereby requested to submit to this office within fifteen days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further deviations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time. Under the authority of section 182 of the Atomic Energy Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.



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