



A Centurian Energy Company

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Docket No. 50-346

License No. NPF-3

Serial No. 1-783

February 29, 1988

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Response to Inspection Report 87031

Gentlemen:

Toledo Edison has received Inspection Report 87031 (Log No. 1-1739 dated January 29, 1988) pertaining to a routine safety inspection conducted by Messrs. P. M. Byron and D. C. Kosloff on November 16 through December 31, 1988 and provides the following response.

Violation

87-031-04 Technical Specification 3.7.9.3.a requires that with one or more fire hose stations in Table 3.7-4 inoperable, an additional equivalent fire hose shall be routed to the unprotected area from an operable hose station within one hour. Fire hose station HCS-30 is listed in Table 3.7-4.

Contrary to the above, on October 26, (SIC) 1987, the licensee replaced a 75 foot hose section with a 50 ft. hose section on fire hose station HCS-30.* The shorter hose rendered fire hose station HCS-30 inoperable because it was unable to reach all of the equipment important to safety in Room 515. The shift supervisor was notified of this condition at 9:57 a.m. on October 26, 1987. The shift supervisor directed that an additional length of hose be added to fire hose station HCS-30, which made it operable. Fire hose station HCS-30 was inoperable for approximately four days.

Acceptance or Denial of the Alleged Violation

Toledo Edison acknowledges the alleged violation.

*Quoted from Inspection Report 87-031. Note that the date "October 26, 1987" should read "October 22, 1987".

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Reason for the Violation

On October 22, 1987 a Periodic Test (PT 5116.11.00), Fire Hose Hydrostatic Test, was performed to hydrostatically test certain fire hose stations required by Technical Specification 4.7.9.3. PT 5116.11 was being performed as part of Surveillance Test (ST 5016.05), Fire Hose Hydrostatic Test. The test had previously been suspended due to lack of spare 75 ft. hoses. Sufficient spare hoses are required to perform the test.

The normal process for this hydrostatic hose test is to replace existing hoses with successfully tested hoses. The removed hoses are then hydrostatically tested in accordance with PT 5116.11.00. This process is repeated until all hose stations are tested.

PT 5116.11.00 contains a note requiring each fire hose station to have at least one 75 ft. section of fire hose. If only 50 foot sections are available then two sections need to be used.

Contrary to the requirement of PT 5116.11.00, on October 22, 1987, a single 50 foot section of fire hose was installed on hose station HCS-30. Test personnel contacted the Control Room and reported the single 50 ft. hose section installed on HCS-30. The Control Room was not notified that HCS-30 is a Technical Specification required hose station because the Control Room personnel were notified of a deficiency in a Periodic Test, not a Surveillance Test. Surveillance Tests are the implementing procedures for Technical Specification surveillance requirements and, therefore, neither the personnel performing the test nor the Control Room personnel were aware that HCS-30 was required operable by the Technical Specification.

This violation of the Technical Specifications was not noticed until the results of the Surveillance Test were turned into the Shift Supervisor October 26, 1987. The cause of the event is personnel error due, in part, to a deficient procedure.

Corrective Actions Taken and Results Achieved

On October 26, 1987 the Shift Supervisor instructed personnel to immediately add another 25 feet of fire hose to HCS-30. The additional hose was added within 1 hour of the Shift Supervisor notification.

Surveillance Test ST 5016.05 will be revised to give specific guidance for immediate Shift Supervisor notification if a hose station fails its test or becomes inoperable. This event has been discussed with the Station Services test personnel who performed the test to emphasize the need to notify the Shift Supervisor when procedural deficiencies are identified to avoid operability concerns.

PT 5116.11.00 will be revised to eliminate testing of hose stations required by the Technical Specifications. All hose stations required by Technical Specifications will be tested by ST 5016.05 upon its implementation.

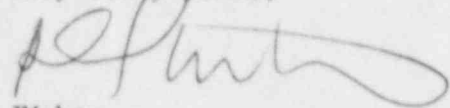
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Additionally each accessible required fire hose station now has a warning label stating: "Minimum Hose Length 75 feet". This warning label is located on each hose station listed in the Technical Specification in Table 3.7-4 that are accessible at power. A warning label will be added to the inaccessible hose station prior to power ascension following the fifth refueling outage.

Date When Full Compliance Will Be Achieved

The revision to ST 5016.05 and PT 5116.11.00 are scheduled for by April 30, 1988.

Very truly yours,



JM:bam

cc: DB-1 Resident Inspector
A. B. Davis, Regional Administrator