Indian Point 3 Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511 914 739.8200



September 26, 1991 IP3-91-053

Docket No. 50-286 License No. DPR-64

Document Control Desk Mail Station PI-137 U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Sir:

The attached revised Licensee Event Report LER 91-008-01 is hereby submitted in accordance with the requirements of 10CFR50.73. This event is of the type defined in the requirements per 10CFR50.73(a)(2)(vi). This revision addresses a discovery, during the continued engineering assessment, of an additional cable separation fire barrier for redundant safety equipment not installed during original plant construction.

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Very truly/yours

Joséph Russell Resident Manager Indian Point Three Nuclear Power Plant

djc/rj Attachment

cc: Mr. Thomas T. Martin Regional Administrator Region 1 U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

> INPO Records Center Suite 1500 1100 Circle 75 Parkway Atlanta, Georgia 30339

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On July 10, 1991, with the unit operating at 100% power, it was identified that some of the electrical cable trays for redundant safeguards equipment did not conform to the separation criteria as described in the Indian Point Unit 3 Final Safety Analysis Report (FSAR). During original plant construction some cable trays and barriers were not installed as specified on the drawings. An engineering assessment to verify the installation of barriers as described on plant drawings was performed for all areas except for the vapor containment building, which will be performed during the scheduled April, 1992 refueling outage. Based on the engineering assessment, some barriers have been and are being installed.

	T (LER) TEXT CONTINU		GULATORY COMMISSION MB NO. 3150-0104 /88
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
Indian Point Unit 3		YEAR SEQUENTIAL REVISION	
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#### DESCRIPTION OF THE EVENT

On July 3 ,1991, with the unit operating at 100% power, an NRC resident inspector questioned a cable tray configuration. On July 10, 1991, engineering determined the trays contained redundant safety equipment cables, and that the configuration did not meet the design defined in the Indian Point 3 Final Safety Analysis Report Section 8.4., Cable and Penetration Separation. An engineering safety evaluation justified continued plant operation for the as built tray configuration. Engineering continued the assessment for all plant cable trays outside the containment building to verify cable separation barriers were installed as described on drawings. Based on the assessment, the actions listed on Attachment I were taken.

### **INVESTIGATION OF THE EVENT**

Engineering determined that the cable trays identified by the inspection contained redundant safety equipment cables and did not meet the required separation criteria. Separation of channels is established throughout the plant by the use of separate trays or conduits. In addition, whenever a heavy power tray is located less than three (3) feet beneath any tray of a different channel, a transite or marinite fire barrier is installed between the trays. A vertical barrier is installed where trays of different channels are installed less than one (1) foot apart, horizontally. Additionally, a horizontal barrier is installed where trays (other than heavy power) are installed less than one (1) foot beneath any tray of a different channel.

#### CAUSE OF THE EVENT

This event was caused by installation inadequacies during original plant construction.

NRC FORM 3664

NRC Form 366A (9-83)	LICENSEE	T (LER) TEXT CONTINU		BULATORY COMMISSION MB NO. 3150-0104 /88
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## CORRECTIVE ACTIONS

An engineering assessment to verify the installation of barriers as described on plant drawings was performed for all areas except the vapor containment, which will be performed during the scheduled April, 1992 refueling outage. Based on the engineering assessment specific action was taken as indicated on Attachment I.

### ANALYSIS OF THE EVENT

This event is reportable under 10CFR50.73 (a) (2) (vi) as a discovery of construction inadequacies. If additional inadequacies are identified during further assessments, revisions to this document will be forwarded.

# SECURING FROM THE EVENT

An engineering assessment to verify the installation of barriers as described on plant drawings was performed for all areas except the vapor containment, which will be performed during the scheduled April 1992 refueling outage. The actions listed on Attachment I were taken for redundant safety equipment cables not meeting the separation criteria.

NRC Form 3664 A9-831 LICENS	SEE EVER REPORT (LER) TEXT CONTIN	U.S. NUCLEAR REGULATORY COMMISSIC APPROVED, OMB NO. 3150-0104 EXPIRES: 8/31/88
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	<u>ATTACHMENT_I</u>	
and the second	Cable Separation Fin	<u>idings</u>
Item		
Number	Equipment Description	Action
	Aunilian Dailan Daad	
1	Auxiliary Boiler Feed	o Identified barrier
	Pumps Nos. 31 and 33 instrumentation and	not installed as per drawing -
	control cables	7/10/91
	concror cables	//10/91
		o commenced
		modification to
		install barrier -
		7/10/91
		o Justification For
		o Justification For Continued
		Operation - 7/10/91
		o Barrier installed
		9/3/91
		9/3/91
2	Residual Heat Removal	o Identified barrier
:	Pumps Nos. 31 and 32	not installed as per
	power cables	drawing - 7/29/91
	power capies	
		o Commenced
		installation of
		barrier - 7/29/91
		o Barrier installed -
		8/1/91
		o Identified redundant
		cables - 8/2/91
		o One hour report to
		NRC - 8/2/91
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	ATTACHMENT I		
Item	Cable Separation Findi	ngs	
Number	Equipment Description	Action	
3	Reactor Coolant Flow	o Identified	1
	and Steam Generator	barrier not	
	Level transmitter	installed as	per
	instrumentation	drawing - 7/2	
	cables to the		
	Reactor Protection	o Commenced	
	System	installation	
		barrier - 8/1	19/91
		o Barrier insta	alled
		8/20/91	
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