Indian Point 3 Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511 914 736.8001



June 17, 1993 IPN-93-064

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

SUBJECT: Indian Point 3 Nuclear Power Plant Docket No. 50-286 Licensee Event Report LER 93-020-00, "Missed Preventive Maintenance on Emergency Diesel Generator Air Start System Due to <u>Personnel Error"</u>

Dear Sir:

The attached Licensee Event Report LER 93-020-00 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)(i)(B). Also attached are the commitments made by the Authority in this LER.

Very truly yours,

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John H. Garrity Resident Manager Indian Point Three Nuclear Power Plant

JHG/fp Attachments

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PDR

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

> INPO Records Center 700 Galleria Parkway Atlanta, Georgia 30339-5957

U.S. NRC Resident Inspector's Office Indian Point Unit 3

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John H. Garrity Resident Manager





ATTACHMENT LIST OF COMMITMENTS MADE IN LETTER IPN-93-064

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Number	Commitment	Due
IPN-93-064-01	The Authority will train maintenance engineers and managers who are responsible for performing evaluations that affect safety, on 10 CFR 50.59 and 10 CFR 50.92 requirements that govern changes to FSAR and technical specifications.	Before startup from the current outage.
IPN-93-064-02	Maintenance will resolve any discrepancies identified during the review of the ALCO Engine Maintenance Schedule (Diesel Matrix).	August 1, 1993
IPN-93-064-03	Maintenance will replace all air start relief valves using Design Equivalent Modification 90-03-090 EDG. The replacement valves are manufactured by Anderson, Greenwood and Company (AGCO) and are type 83 gas flanged relief valves.	Before startup from the current outage.
IPN-93-064-04	To determine the extent of this condition, besides reviewing the EDG PMs, the Authority has Performance Improvement Plan Item # 174, "Enhancement of Station PM Program" as a long term action. Using this PIP item, the Authority will systematically review and evaluate plant systems and components for their potential inclusion in the PM program. The Authority will then review the vendor manuals for these systems and make the appropriate changes to existing PM procedures or develop new ones as required to ensure that they are performing the appropriate PMs on these systems.	These actions will be completed in accordance with the PIP schedule.

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<pre>IEXT (If more space is required, use additional copies o DESCRIPT On May 20, 1993, at 2005 hour an NRC inspector noted, and I that the Authority had not pe maintenance (PM) inspection of air start relief valves (EK) (F the relief valves be removed, 12 years. Technical Specific generator shall be inspected manufacturer's recommendation The subject relief valves are as safety relief valves on th associated piping used with t The 12-year interval for vend Crosby relief valves began on Specifications became effecti for these valves became due of At 2143 hours, on May 20, 199 emergency notification pursua Maintenance personnel submitt replace the valves using a De 90-03-090 EDG. The Technical response to NRC Information N Problems with Crosby Safety R Receiver Tanks." On April 3, information notice, the Techn Justification for Continued O In Inspection Report No. 50-2 Commission cited the Authorit Specification 4.6.A.4, specif address the long term diesel result, the Authority agreed emergency diesel generator ma revised standby preventive ma retained ALCO to provide enha II would revise procedures ne the new program. Although th that these relief valve inspe maintenance schedule, mainten they wrote and revised the pro- temer the procedure of the provide of the</pre>	ION OF THE E s, while the indian Point formed the on the emerge V). The ven recondition ation 4.6.A. and maintain is for this c crosby styl e diesel air he ALCO 251 or recommend December 12 ve. Therefo in December 1 3, the Autho nt to 10 CFR ed Problem I sign Equival Services de otice No. 90 elief Valves 1993, also ical Service peration. 86/88-21, the y for a viol ically becaus engine maint to carry out intenance pro- ncements to cessary to a is was the p ctions be ind-	VENT plan plan yendo lan plan vendo nor, lan plan vendo nor, lan plan lan plan lan lan lan lan lan lan lan	23) person or recommend liesel gen GE-ALCO, ad reinsta tes that of stand- BU. ALCO t receive als. intenance 5, the day the 12-yea 87. made a for 2 (b) (2) (fications lodifications lodifications lodifications lodifications entitled on Diese sponse to partment is erecommend of Techn P3 procedu e recommend of Techn P3 procedu	nel ag nded p erator recomme lled of "Each of by served supplie r tanks on the y IP3 f r PM in ur-hour i) to f (PIDs) on (DEN d this "Potent l Air s the ssued a latory ical ures d hdation rogram incorp thority recomme 12-year	reed, reventive (EDG) ends that nce every diesel vice." es these s and ese Technical nspection r non- the NRC.) to M) DEM in tial Start a id not ns. As a for porate a Y Phase nts of ended c

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The cause of this event was p This resulted in the PM for t into a plant preventive maint CORREC	he relief va	lves not being i am.	to detail. ncorporated				
To prevent recurrence of this will be performed:			ive actions				
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This event is reportable under shall report any operation or technical specifications. Ter states that "Each diesel gener following the manufacturer's	condition p chnical spec rator shall recommendati	rohibited by the ification section be inspected and ons for this class	plant's n 4.6.A.4 maintained ss of				
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This event did not affect the health and safety of the public. Three independent EDGs with independent air start systems are available at IP3. Any two EDGs can provide the emergency power necessary to mitigate the consequences of design basis events. The air start system for each diesel consists of one air compressor, one accumulator tank, and associated piping and valves.

The potential consequence of missing this PM is failure of the safety relief valves. The failure could manifest itself either as an overpressurization because the valve did not open when it should or the valve failing to close when it should, following an actuation. Both mechanisms could result in inadequate air pressure to start a diesel. In both cases, a component failure (i.e., a pressure control valve fails open, a pressure switch fails to actuate or a valve is positioned incorrectly) is a necessary precursor to the overpressure condition.

The three independent EDG starting air systems are interconnected but are normally isolated from one another by means of manual isolation valves that are administratively controlled. Therefore, in the unlikely event that a valve failure was to occur coincident with a design basis event, two diesels would be available to mitigate the consequences of an accident. Throughout the period when the PM was due, there were no failures to the diesel air system that could have led to overpressurization

To determine the extent of this condition, besides reviewing the EDG PMs, the Authority has Performance Improvement Plan Item # 174, "Enhancement of Station PM Program" as a long term action. Using this PIP item, the Authority will systematically review and evaluate plant systems and components for their potential inclusion in the PM program. The Authority will then review the vendor manuals for these systems and make the appropriate changes to existing PM procedures or develop new ones as required to ensure that they are performing the appropriate PMs on these systems. These actions will be completed in accordance with the PIP schedule.