

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)  
Indian Point 3

DOCKET NUMBER (2)  
05000286

PAGE (3)  
1 OF 4

TITLE (4)  
Inadequate Surveillance Test, Due To Personnel Error, Caused The Inoperability Of The Control Room Toxic Gas Monitor

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 NAME	DOCKET NUMBER
06	11	93	93	-- 023 --	00	07	09	93	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
POWER LEVEL (10)	000	20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
		20.405(a)(1)(iii)	✓	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 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 (Include Area Code)
Stephen Manzione, I&C Engineer	(914) 736-8783

## 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)

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

## ABSTRACT

On June 11, 1993, with the plant in the cold shutdown condition, Instrumentation and Control personnel determined that the surveillance test for the Control Room Toxic Gas Monitor, 3PT-M55, revision 8, "Toxic Gas Monitoring System Check", did not fulfill the requirements of Technical Specification section 4.5.A.5.e. As a result, those channels which monitor chlorine and ammonia in the control room atmosphere had not been functionally tested at least once every 31 days since April 17, 1989. The cause of this event is personnel error in that 3PT-M55 was improperly revised to delete requirements of the Technical Specifications. Corrective actions included revising surveillance test 3PT-M55 and committing to review a sample of procedures to determine if similar deficiencies exist. On June 11, 1993, ammonia and chlorine channels were tested satisfactorily; thereby, demonstrating the operability of the Central Control Room Toxic Gas Monitoring system.

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DESCRIPTION OF EVENTS

On June 11, 1993, with the plant in a cold shutdown condition with reactor coolant temperature and pressure at 114 degrees Fahrenheit (F) and 0 pounds per square inch (psig) respectively the central control room (CCR) toxic gas monitor (MON) was found to be inoperable. Surveillance test 3PT-M55, revision 8, "Toxic Gas Monitoring System Check" was found to be inadequate. Since April 17, 1989, the channel check for two of the three monitored control room gases was not performed at least once every 31 days due to the test inadequacy. The CCR toxic gas monitor was manufactured by ENMET and is Model No. ISA-44. This inoperability determination was made by Instrumentation and Control (I&C) engineering in response to comments by the I&C technicians. The CCR Toxic Gas Monitoring System (VI) monitors the control room atmosphere for low levels of oxygen and high levels of ammonia and chlorine. Technical Specification section 4.5.A.5.e requires that a channel test of the oxygen, ammonia and chlorine channels be performed at least once every 31 days. On April 17, 1989, the surveillance procedure was amended and the functional test requirement for the ammonia and chlorine channels was deleted.

Technical Specification section 1.9.2 defines an instrument channel functional test as follows; "Injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating action."

Surveillance test 3PT-M55 failed to functionally test the ammonia and chlorine channels because a simulated signal was not injected into these channels. Instead, the test only provided a "zero" check of the ammonia and chlorine channels by applying oxygen gas to each of the ammonia and chlorine sensors.

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On June 11, 1993, a temporary change was made to 3PT-M55 to inject ammonia and chlorine test gases and functionally test the channels per Technical Specification section 1.9.2. On the same day (June 11, 1993) all ammonia and chlorine channels were tested satisfactorily; thereby, demonstrating the operability of the CCR Toxic Gas Monitoring System.

CAUSE OF THE EVENT

The cause of this event was personnel error in that surveillance test 3PT-M55 was improperly revised on April 17, 1989. The individual revising the test improperly deleted the Technical Specification test requirements for the CCR Toxic Gas Monitoring System's ammonia and chlorine channels.

CORRECTIVE ACTIONS

The following corrective actions will be performed in order to prevent recurrence of this event:

1. Surveillance procedure 3PT-M55 was revised on July 6, 1993 to include a requirement for a functional channel test of oxygen, ammonia and chlorine sensors no later than once every 31 days.
2. The I&C department will perform a review of a representative sample of 32 procedures prior to plant startup to verify that the Technical Specification requirements are met. The 32 procedures will be chosen using the techniques in Quality Assurance Instruction QAI 7.2, "Receiving Sampling Inspection."

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**ANALYSIS OF THE EVENT**

This event is reportable under 10CFR50.73(a)(2)(i)(B). The licensee shall report: "any operation or condition prohibited by the plant's Technical Specifications." Technical Specification section 4.5.A.5.e requires that at least once every 31 days a channel test of the oxygen, ammonia and chlorine channels shall be performed. During the period, April 17, 1989 to June 11, 1993, the monthly surveillance test failed to adequately test the ammonia and chlorine channels as required by the Technical Specifications.

A similar event, Missed Surveillance on Gaseous Effluent Flow Rate Monitor, was reported in LER 93-003-00.

**SAFETY SIGNIFICANCE**

This event did not affect the health and safety of the public. The control room toxic gas monitors are functionally checked every three months by surveillance procedure 3PT-Q66. This procedure requires the testing of each channel of the monitor. A review of these results of tests performed during the period, March 1992 through April 1993, revealed one instance where one of the channels failed to operate as required; the ammonia channel in March 1992.