Stephen B. Bram
Vice President

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January 17, 1992

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 91-23-00

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

The attached Licensee Event Report LER 91-23-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

Very truly yours,

Attachment

cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Francis J. Williams, Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

NRC FORM 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Indian Point Unit No. 2	0 5 0 0 0 2 4 7	1 OF 0 4

TITLE (4)

Venting of Charging Pump During VC Pressure Relief Causes ESF Actuation

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 NAMES	DOCKET NUMBER(S)
										0 5 0 0 0
1 2	1 9	9 1	9 1	0 2 3	0 0	0 1	2 1	9 2		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
N		20.402(b)	20.405(c)	X 50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	1 0 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(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
	AREA CODE
George Dahl, Engineer	9 1 4 5 2 6 - 5 1 8 6

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On December 19, 1991, with the plant at 100% power, a gaseous release was in progress through the plant vent due to venting of a charging pump suction stabilizer during operational lineup of the pump following maintenance activities. The release was sufficient to exceed the setpoint of the Plant Vent Gaseous Activity Monitor (R-44) which resulted in isolation of the containment Ventilation system and automatic actuation of the Weld Channel and Containment Penetration Pressurization System. It was subsequently determined that the release corresponded to a maximum value of only 15% of the maximum instantaneous concentration permitted by Technical Specifications for an unrestricted area. The total noble gas radioactivity released was 0.072 curies. No Technical Specification or NRC limits were exceeded. The health and safety of the public was not affected by this event.

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCES:

Engineered Safety Feature (ESF) actuation due to alarm setpoint on radiation monitor being exceeded during planned pressure relief of containment.

EVENT DATE:

December 19, 1991

REPORTABILITY DETERMINATION DATE:

December 19, 1991

REPORT DUE DATE:

January 21, 1992

REFERENCES:

Significant Occurrence Report (SOR) 91-642

PAST SIMILAR OCCURRENCES:

LER 90-14: ESF actuations associated with exceeding of radiation monitor setpoints
LER 90-13: ESF actuation due to indicated radioactivity increase in containment
LER 90-12: ESF actuation due to planned gaseous release through plant vent
LER 89-03: ESF actuation due to unplanned gaseous release through plant vent
LER 87-10: ESF actuation due to unplanned gaseous activity in containment

DESCRIPTION OF OCCURRENCE:

On December 19, 1991, the suction stabilizer to Charging Pump No. 21, which is located in the primary auxiliary building, was being vented to the plant vent during preparations to restore the pump to service following completion of maintenance activities. At approximately 1830 hours, the release of radioactivity due to the venting of the pump was sufficient to exceed the setpoint of the Plant Vent Gaseous Activity Monitor (R-44). This resulted in automatic termination of the containment pressure relief and actuation of the Weld Channel and Containment Penetration Pressurization (WCCPP) system. The highest reading during the release was 1.7E-4 uCi/CC and the average reading was 6.7E-5 uCi/CC. The daily average reading for R-44 was approximately 1.5E-6 uCi/CC. Subsequent calculation determined the release rate did not exceed 15% of the maximum instantaneous concentration for an unrestricted area and the total noble gas radioactivity released was 0.072 Ci.

CAUSE OF OCCURRENCE:

The venting of the suction stabilizer for Charging Pump No. 21 following completion of maintenance activities resulted in a release of radioactivity that exceeded the setpoint of the Plant Vent Gaseous Activity Monitor (R-44). This, in turn, initiated Containment Ventilation Isolation and partially actuated the WCCPP system.

ANALYSIS OF OCCURRENCE:

The Containment Ventilation system can be automatically isolated by a Containment Isolation Phase A signal, containment spray actuation, or a high radiation indication from either the Containment Air Particulate Monitor R-41, Containment Radiogas Monitor R-42, or Plant Vent Gaseous Activity Monitor R-44. Any of these three initiating signals results in the isolation of the containment purge and supply lines and the containment pressure relief line, which are the components of the Containment Ventilation system. Coincident actuation of that portion of the WCCPP system that supplies sealing air to the three ventilation lines also occurs. Air from contaminated areas, such as containment and the primary auxiliary building, is normally filtered and exhausted into the plant vent for monitored release to the environment with maximum dispersion.

ANALYSIS OF OCCURRENCE: (continued)

For this event, the setpoint on monitor R-44 was exceeded due to an actual release through the plant vent from an area other than containment and a Containment Ventilation Isolation signal was generated. The setpoint is set conservatively low such that the normal containment vent release path is isolated whenever the activity level in containment is at a fraction of the level permitted by Technical Specifications for normal releases. Although Containment Ventilation Isolation and the WCCPP system did function as designed, their actuation was not required to mitigate any adverse radiological conditions in containment. There were no equipment failures associated with the event.

As a result of similar occurrences last year, operators in the field had been instructed to notify the control room to ensure that no containment pressure relief is in progress prior to venting a charging pump line. Further, training was scheduled to remind operators that radiation monitor setpoints are to be chosen within procedural limits such that evolutions altering plant operational and/or radiological conditions will not cause unnecessary radiation monitor automatic trips resulting in ESF actuations. Additionally, direction to avoid venting of equipment to the plant vent during a pressure relief of containment had been posted in the control room operators' night order book.

In spite of these corrective actions, miscommunication between the field operators and the control room operators in this recent event resulted in pump venting during a pressure relief of containment without setpoint adjustment of the radiation monitor.

CORRECTIVE ACTIONS:

Procedural changes have been implemented to preclude unnecessary ESF actuations. Cautions and steps have been added to the three system operating procedures (SOP 3.1, Charging Seal Water and Letdown Control; SOP 5.2.4, Calculation and Recording of Radioactive Gaseous Release; SOP 11.2, Containment Pressure Relief and Purge System Operation) that are used during containment pressure relief and equipment venting to ensure that all parties involved avoid pump venting during pressure relief of containment and are notified of a concurrent potential release through the preparation of an airborne radioactive waste release permit.