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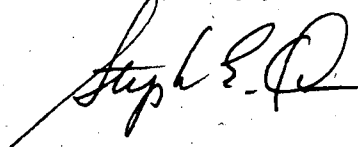
March 6, 1995

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 95-03-00

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

The attached Licensee Event Report LER 95-03-00 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
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US Nuclear Regulatory Commission
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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH 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.

FACILITY NAME (1) Indian Point Unit No. 2										DOCKET NUMBER (2) 0 5 0 0 0 2 4 7										PAGE (3) 1 OF 0 4							
TITLE (4) VC Ventilation Isolation While Placing PRT Educator in Service																											
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	2	0	4	9	5	9	5	0	0	3	0	0	0	3	0	6	9	5	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)																								
POWER LEVEL (10)			20.402(b)					20.405(a)(1)(i)					20.405(c)					50.73(a)(2)(iv)					73.71(b)				
0 0 1 0			20.405(a)(1)(ii)					20.405(a)(1)(iii)					50.36(c)(1)					50.73(a)(2)(v)					73.71(c)				
			20.405(a)(1)(iv)					20.405(a)(1)(v)					50.36(c)(2)					50.73(a)(2)(vi)					OTHER (Specify in Abstract below and in Text, NRC Form 365A)				
			20.405(a)(1)(vi)					20.405(a)(1)(vii)					50.73(a)(2)(i)					50.73(a)(2)(vii)(A)									
			20.405(a)(1)(viii)					20.405(a)(1)(ix)					50.73(a)(2)(ii)					50.73(a)(2)(viii)(B)									
			20.405(a)(1)(x)					20.405(a)(1)(xi)					50.73(a)(2)(iii)					50.73(a)(2)(ix)									
LICENSEE CONTACT FOR THIS LER (12)																											
NAME															TELEPHONE NUMBER												
George Dahl, Engineer															AREA CODE		7 3 4 7 3 4 - 5 1 8 6										
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC					
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) (18)

While in the process of a plant cooldown in preparation for a refueling outage, two attempts were made to vent the pressurizer relief tank to the plant vent using the eductor. Both attempts were unsuccessful because the resulting releases were 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. The first event occurred at 2216 hours on February 4, 1995, with the reactor coolant system at 258F and 380 psig, and the second event occurred on February 5, 1995 at 0115 hours with the reactor coolant system at 205F and 380 psig. The cause for both events is attributed to the fact that what proved to be a non-representative sample point had been used for the release calculation, and an initial surge of activity when the eductor was initially placed into service. Procedural changes will be made to require a more representative sample and in regard to the method used to place the eductor into service.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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FACILITY NAME (1) Indian Point Unit No. 2	DOCKET NUMBER (2) 05000247915	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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						OF	4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCES:

Engineered Safety Feature (ESF) actuations due to exceeding of alarm setpoint on plant vent radiation monitor after placing the pressurizer relief tank eductor into service.

EVENT DATES:

February 4 and February 5, 1995

REPORT DUE DATE:

March 6, 1995

REFERENCES:

Significant Occurrence Reports (SOR) 95-78, 95-78A

PAST SIMILAR OCCURRENCES:

LER 92-12, VC Ventilation Isolation due to Failure to Adjust Radiation Monitor Setpoints

DESCRIPTION OF OCCURRENCES:

On February 4, 1995, a plant cooldown was in progress in preparation for a refueling outage. A nitrogen bubble had been established in the pressurizer. Pressure in the pressurizer relief tank (PRT) was observed to be rising which was attributed to leakage past a power operated relief valve. In preparation for educting the PRT to the plant vent to relieve pressure, an airborne radioactive waste release permit was prepared as required by procedure SOP 5.2.4, "Calculation and Recording of Radioactive Gas Release." The calculation to determine the setpoint for the Plant Vent Gaseous Activity Monitor R-44 was performed using noble gas activity from a liquid sample of the reactor coolant. After setpoint adjustment, the PRT eductor was placed into service at approximately 2216 hours with the reactor coolant system temperature at 258F and pressure at 380 psig. Shortly thereafter, monitor R-44 alarmed which resulted in automatic containment ventilation isolation and actuation of the Weld Channel and Containment Penetration Pressurization (WCCPP) system. At approximately 0115 hours on February 5, 1995, a second containment ventilation isolation and WCCPP actuation occurred after another attempt was made to educt the PRT. A second sample was subsequently obtained of the pressurizer gas

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		9 5	— 0 0 3	— 0 0	0 3	OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF OCCURRENCES: (continued)

space, which indicated an activity level of an order of magnitude higher than the level used in the release calculation based on the initial reactor coolant sample. The setpoint of monitor R-44 was adjusted based on the second sample and later efforts to use the eductor were successful.

ANALYSIS OF OCCURRENCES:

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.

The setpoint of monitor R-44 is set below the Technical Specification instantaneous limit and a comfortable margin above its current reading or the anticipated reading under planned release conditions. This setpoint philosophy assures compliance under all operating conditions. For most releases, the setpoint is a small fraction of the Technical Specification limit. As release circumstances require, the setpoint is raised with proportional management level approval. In these events, the setpoint on monitor R-44 was exceeded due to actual releases from the PRT through the plant vent and a containment ventilation isolation signal was generated. Although the Containment Ventilation and the WCCPP systems did function as designed, actuation to their safeguards positions was unnecessary to mitigate any adverse radiological conditions in containment or the PRT. Further, with the levels released being a fraction of that permitted by Technical Specifications, a hypothetical failure of the Containment Ventilation system to isolate or the WCCPP system to actuate would not have resulted in any adverse effects. Therefore, there were no safety consequences of this event. This report is being made, however, because any manual or automatic actuation of an ESF is reportable under 10 CFR 50.73(a)(2)(iv).

CAUSE OF OCCURRENCES:

The normal procedural method of relieving pressure in the PRT is to discharge to the vent header. Gases in this header are then processed by the waste gas system prior to a controlled release to the environment. With significant nitrogen leakage into the PRT causing an increase in pressure, and with concern that the PRT rupture disc design pressure could be exceeded, a controlled tank venting to the plant vent was chosen.

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TEXT (If more space is required, use additional NRC Form 365A's) (17)

CAUSE OF OCCURRENCES: (continued)

The sample taken to calculate the setpoint for monitor R-44 was a liquid sample of the reactor coolant. Activity measured in a liquid sample does not directly correlate to gaseous activity, and reactor coolant activity may not be representative of activity level in the PRT. Absent a direct sample of the PRT gas space, a sample of the pressurizer gas space would have been more representative of the PRT activity since there was leakage into the PRT from the pressurizer. A more representative sample would have resulted in a higher setpoint for R-44 or a decision to align the PRT to the vent header if the required setpoint would have exceeded allowable limits.

After the first event, the second attempt to educt the PRT was made without another sample being obtained. Although it was believed that the release calculation and setpoint were correct and that an initial surge of activity from the pressurized tank exceeded the setpoint, the second attempt should not have been made without obtaining a second sample. The sample of the pressurizer gas space subsequent to the second event resulted in a setpoint for monitor R-44 that eventually permitted successful use of the PRT eductor.

CORRECTIVE ACTIONS:

Procedure SOP 1.2, "Draining Reactor Coolant System", has been revised to require the PRT gas space and pressurizer gas space to be sampled prior to placing the eductor into service if effluent has been introduced into the PRT since the eductor was last secured. The highest activity level would then be used for the release calculation. Procedure SOP 1.6, "Pressurizer Relief Tank Operations", will be revised by May 1, 1995 to also include this requirement.

SOP 1.6 will also be revised by May 1, 1995 to require the initial lineup of the eductor to the plant vent prior to placing station air (the driving force for the eductor) into service. This will allow the PRT pressure to decrease and preclude the initial surge of activity to the plant vent.

Training of the control room operators in the procedure revisions will be accomplished. This event will be highlighted during licensed operator re-training as an example of non-conservative decision making that should be avoided, and which does not measure up to management expectations for facility operations.