Stephen E. Quinn
Vice President

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April 11, 1996

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 96-04-00

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

The attached Licensee Event Report LER 96-04-00 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. Jefferey Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
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Washington, DC 20555

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NRC FORM 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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.

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

TITLE (4)

Potential Path for Unfiltered Air Inleakage to the Central Control Room

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 3	1 2	9 6	9 6	— 0 0 4 —	0 0	0 4	1 1	9 6		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): N

POWER LEVEL (10): 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check one or more of the following)* (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)
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)	X 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)
Robert L. Spring, Engineer	2 1 2 4 6 0 - 6 0 2 4

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)

X YES *(If yes, complete EXPECTED SUBMISSION DATE)* NO

EXPECTED SUBMISSION DATE (15): MONTH 0 6 DAY 1 1 YEAR 9 6

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

During the course of a Control Building roofing project, with the unit at full power, a strip of roofing material (an expansion joint) was removed which resulted in a narrow gap in the structure that could have resulted in increased unfiltered air inleakage to the Central Control Room in the event of a loss of coolant accident or a toxic gas event. The gap was temporarily resealed after an approximate four hour time period and was permanently sealed in a subsequent planned maintenance outage.

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Potential path for unfiltered air inleakage to the Central Control Room existed for about 4 hours on December 6, 1995.

EVENT DATE:

March 12, 1996

REPORT DUE DATE:

April 11, 1996

REFERENCES:

Significant Occurrence Report (SOR) 96-247, March 12, 1996

PAST SIMILAR OCCURRENCE:

LER 82-049

DESCRIPTION OF OCCURRENCE:

The Indian Point 2 Control Building consists of the original Indian Point 1 Control Building extended by the addition of the Indian Point 2 Control Building to form the equivalent of one large building to house the current Indian Point 2 Central Control Room (CCR). On the roof, at the juncture of the two buildings, is an expansion joint - a membrane, similar to the roofing material - to allow independent movement of the two buildings during a seismic event.

On December 6, 1995, in the course of a Control Building roofing material replacement project, while the unit was at 100% power, the expansion joint, which was also scheduled for replacement as part of the project, was removed and the gap between the buildings was subsequently covered with a temporary membrane.

In the time period (about 4 hours) before the temporary membrane was in place, a path for additional unfiltered air inleakage to the CCR may have existed, had an incident occurred resulting in the ventilation system being placed in the recirculation mode. This realization occurred on February 7, 1996 during a reevaluation of the roof replacement project. A subsequent inspection on that date indicated that the existence of such a leak path was not conclusive. This inspection was limited in scope by reason of inaccessibility.

ANALYSIS OF OCCURRENCE:

The Indian Point 2 CCR is not an airtight structure and it has been recognized that unfiltered air inleakage will exist in the event of a loss of coolant accident or a toxic gas event. Previous analyses have used a value of 500 CFM as an estimate of that inleakage for CCR habitability evaluations. It should be noted, however, that, for radiological thyroid dose purposes, the assumed inleakage in CCR habitability analyses is not critical; increased inleakage is tolerable as long as the self-contained respirators, provided for this purpose, are donned in a reasonable time by the CCR occupants. While this roof membrane was not in place, the potential existed for an increase in the value used in the UFSAR. On March 12, 1996, this incident was determined to be reportable on the assumption that the February 7, 1996 inspection was not conducted in enough depth to have concluded definitively that the potential unfiltered air inleakage was not beyond the previously assumed 500 CFM.

CAUSE OF OCCURRENCE:

At the time (December 6, 1995), it was not recognized that there may have been a path for unfiltered air inleakage to the CCR with the expansion joint not in place. This was mainly due to the project having been planned and engineered by a corporate commercial structures group responsible for roof work system wide, and not by Nuclear Power personnel. This resulted in an incomplete scope of work being prepared for purposes of 10 CFR 50.59 evaluation and Quality Assurance involvement.

CORRECTIVE ACTION:

During a planned maintenance outage in February, 1996, a permanent expansion joint/membrane was installed. A re-organization in January 1996 transferred the Nuclear Power Engineering Organization to the Vice President - Nuclear Power. As a result engineering modifications to the plant will be the responsibility of Nuclear Power personnel in lieu of external corporate organizations.

Further root cause evaluations are currently underway including reviews of other modifications that may have been prepared by other external corporate organizations. Additional corrective actions will be presented in a supplemental report.