

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Indian Point 3		DOCKET NUMBER (2) 05000286	PAGE (3) 1 OF 5
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TITLE (4) Lack Of Surveillance Testing on Smoke Detectors Due To Personnel Error Placed The Plant In a Condition Prohibited By Technical Specification

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
11	18	82	95	-- 013 --	00	08	03	95	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10) 038	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
	20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
	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)		

NAME R. Lauricella, Fire Protection Engineer	TELEPHONE NUMBER (Include Area Code) (914) 736-8670
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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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE.)	<input checked="" type="checkbox"/> NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On July 6, 1995, at approximately 0950 hours, with the plant in power operation, the fire protection system engineer reported that surveillance testing had never been performed for six fire protection system duct smoke detectors located in the control room return air duct. The six detectors were required to be tested and three were required to be operable by Technical Specifications 3.14.D.1 and 4.12.D.1, from November 18, 1982 through January 13, 1995 and, subsequently, by administrative controls. The six detectors were declared inoperable and a fire watch was established in accordance with Indian Point Unit 3 Operational Specification 3.5.4. Two detectors failed a subsequent, July 18, 1995 surveillance test and troubleshooting will be performed prior to further testing. This event was caused by personnel error. There was no significant effect on public health and safety. Corrective action includes: the existing procedure for formal Technical Specification change and control of the interpretation Technical Specifications; the planned removal of the six smoke detectors from administrative requirements for smoke detectors; and, upgrading the surveillance test to identify detectors by location. An assessment found the event was limited to these smoke detectors.

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

DESCRIPTION OF EVENT

On July 6, 1995, at approximately 0950 hours, with the plant in power operation (reactor power level at 38 percent), the fire protection system engineer initiated Deviation Event Report (DER) 95-1580 to report a lack of surveillance testing for six (6) fire protection system (FPS) (IC) duct smoke detectors (DET) located in the control room (CR) (VI) return air (exhaust) duct. The fire protection system engineer had determined that the 6 detectors were required to be operable by Technical Specification 3.14.D.1 from November 18, 1982 (effective date of Amendment 45) through January 13, 1995 (effective date of Amendment 157) and, by administrative controls (Operational Specifications) to the present. The 6 detectors were declared inoperable and a fire watch was established in accordance with Indian Point Unit 3 Operational Specification 3.5.4.

The DER was written following a preliminary investigation by the fire protection system engineer. The fire protection system engineer initiated the preliminary investigation following a July 3, 1995 discussion with a Performance Technician who questioned whether the specific wording of the specification (i.e., ductwork) was consistent with the surveillance test (i.e., 3PT-SA13).

The investigation of this event by the fire protection system engineer determined the following:

1. NYPA made commitments to add CR smoke detectors in letters dated June 29, 1978 and October 23, 1978 (16 in the CR proper, 6 in the CR return air duct, 5 in the CR supervisory panel, and an undefined number in the panel with charging pump controls (i.e., flight panel)). The fire protection Safety Evaluation Report issued by the NRC on March 6, 1979 accepted the commitments as sufficient to meet the requirements for fire protection and also required a Technical Specification amendment after fire protection modifications were completed.
2. Modification 80-03-022 FP added 29 smoke detectors to the CR (i.e., 5 in the supervisory panel, 2 in the flight panel, 16 on the ceiling and 6 in the return air ductwork which exhausts from both the CR proper (2 ducts) and the supervisory panel (1 duct)) to meet commitments to the NRC.
3. A Technical Specification change request, submitted to the NRC on February 20, 1981, listed the minimum operable smoke detectors in the CR as 8 for the ceiling, 2 for the supervisory panel, 3 for

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the ductwork, and 1 for the flight panel. The NRC approved this list of smoke detectors, without change, in Amendment 45 on November 18, 1982.

- Revision 2 to Surveillance test 3PT-SA13, effective February 13, 1981, initiated surveillance testing of the new CR smoke detectors. The surveillance test listed and required testing of 23 CR smoke detectors but did not require testing of the 6 smoke detectors in the ductwork. The 6 smoke detectors in the ductwork were identified in a figure in the Surveillance test.

The fire protection system engineer concluded that the engineer preparing surveillance test 3PT-SA-13, Revision 2, prepared in the same time frame as the proposed Technical Specification, made an error. The nature of the error is not clear because supporting documentation and personnel involved are not available. The error could have been an undocumented interpretation or a misinterpretation of the Technical Specifications requirement or an oversight that resulted in not identifying the duct mounted detectors.

Immediate corrective action was taken by declaring the duct mounted smoke detectors inoperable and establishing a fire watch. Subsequent testing determined that 2 of the smoke detectors were not operable because they could not meet minimum sensitivity requirements. Testing was discontinued until troubleshooting was completed. The current plan for long term corrective action is to remove the 6 duct mounted smoke detectors from the Operational Specification in accordance with the 10 CFR 50.59 review process, and rely on the 16 ceiling and 5 supervisory panel detectors for area early warning detection. Reliance on the 16 ceiling and 5 supervisory panel detectors for area early warning detection is considered the most appropriate corrective action without reducing defence-in-depth. The NFPA 72E philosophy is to use duct smoke detectors for controlling blowers and dampers to prevent smoke migration and not as a substitute for area detectors. Since the duct detectors provide area detection but no control function, reliance on the ceiling mounted area detectors is considered an effective method for providing area early warning detection.

CAUSE OF EVENT

The event was caused by personnel error of an indeterminate nature when preparing Revision 2 of 3PT-SA13.

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CORRECTIVE ACTIONS

NYPA has taken or will take the following corrective actions to address the deficient conditions and prevent recurrence.

- The Fire and Safety Department will revise IP3 Operational Specification 3.5.4, using the 10 CFR 50.59 review process, to delete reference to ductwork smoke detectors. The revision is scheduled for completion by October 27, 1995.
- The Fire and Safety Department will revise Surveillance Procedure 3PT-SA13 to indicate which smoke detectors are required to be operable to meet the requirements of each location identified in Operational Specification 3.5.4. The revision is scheduled for completion by November 21, 1995.
- Similar events should be prevented by the formality of the Administrative Procedure AP-18.7 which requires formal review and PORC approval of Technical Specification Interpretations and changes. The procedure includes a requirement for Department Heads to review and provide a listing of implementing actions required.

ANALYSIS OF EVENT

This event is reportable under 10 CFR 50.73 (a) (2) (i) (B) which requires reporting any operation or condition prohibited by the Technical Specifications. The CR ductwork smoke detectors, required to be operable by Technical Specification 3.14.D.1, had not been tested in accordance with Technical Specification 4.12.D.1 since the specifications became effective in November 18, 1982. When tested, the smoke detectors were found to be inoperable.

Additional events that relate to non compliance with Technical Specifications due to inadequate surveillance testing are discussed in LERs 95-011, 95-010, 94-010, 94-008, 94-004, 94-003, 93-049, 93-041, 93-040, 93-034, 93-028, 93-023, 93-010, 93-009, 93-004, 93-003, and 93-001.

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SAFETY SIGNIFICANCE

This event had no significant effect on the health and safety of the public.

In addition to the 6 duct smoke detectors, the CR is provided with twenty three (23) smoke detectors mounted within panels and above and below the rooms' suspended ceiling. These 23 smoke detectors have been tested semi-annually as part of the performance of 3PT-SA13 since February of 1981. The fire protection engineer reviewed past surveillance tests and found that, except for the six detectors not tested, the CR Technical Specification requirements were met, by location. Since a fire protection assessment of the 23 detectors indicated that the 6 duct smoke detectors would not significantly contribute to early warning detection in the CR, the fire detection was adequate to protect the CR. Additionally, the IP3 CR has been continuously manned since the time of the Amendment 45 implementation. The manning of the CR satisfies the requirement for compensatory action when the smoke detectors in the CR are inoperable.

The extent of condition was assessed by a fire protection review that compared the smoke detectors in the locations identified in the Operational Specification to surveillance testing requirements. The purpose was to assess compliance with the Operational Specification. This also checked past compliance with the Technical Specification since they are the same. The review determined that surveillance testing is being conducted on the smoke detectors in the locations identified in the Operational Specification.

The recent review of the surveillance test program to assure adequate testing to meet the Technical Specifications was not affected because the smoke detector specification is different from most other specifications. The number of components is not readily identifiable in the field unlike pumps or batteries, the specification does not identify specific components to be tested unlike isolation valves and the total number of detectors necessary to meet the specification is not identified.