Indian Point 3 Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511 914 736.8001



Site Executive Officer

October 14, 1995 IPN-95-104

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant Docket No. 50-286 License No. DPR-64 Licensee Event Report # 95-019-00 LER For Completing a Technical Specification Required Shutdown Due to Degraded Vapor Containment Pipe Penetration Caused by An Earlier Inadequate Corrective Action

Dear Sir:

The attached Licensee Event Report (LER) 95-019-00 is hereby submitted as required by 10CFR50.73. This event is of the type defined in 10 CFR 50.73 (a) (2) (i) (A) . Also, attached are the commitments made by the Authority in this LER.

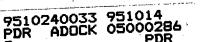
Very truly yours,

L/M. Hill Site Executive Officer Indian Point 3 Nuclear Power Plant

Attachment

cc: See next page

190062



Docket No. 50-286 IPN-95-104 Page 2 of 2

Mr. Thomas T. Martin Regional Administrator Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406-1415

INPO Record Center 700 Galleria Parkway Atlanta, Georgia 30339-5957

cc:

U.S. Nuclear Regulatory Commission Resident Inspectors' Office Indian Point 3 Nuclear Power Plant

Docket No. 50-286 IPN-95-104 Attachment I Page 1 of 1

Attachment I List of Commitments

Number	Commitment	Due
IPN-95-104-01	Operations will revise surveillance test, 3PT-W16, "Penetration Test for Water Leakage" to include testing of the SS penetration.	October 30, 1995
IPN-95-104-02	Engineering will evaluate the need to open selected penetrations during the Refueling Outage-9 outage to inspect their material condition.	January 30, 1996
IPN-95-104-03	Engineering will evaluate the merits of adding flow through test capability to the spare lines of penetration ZZ and spare lines of other penetrations to enable draining of these lines should water be introduced in the future.	April 1, 1996
IPN-95-104-04	Engineering will ensure penetrations that have residual moisture are dried to lower levels during the Refueling Outage-9.	December 1, 1996

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NRC FORM 366 (5-92)

NRC FORM 366A U.S. NUCLEAR (5-92)	AR REGULATORY COMMISSION APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95						
LICENSEE EVENT REPORT (I TEXT CONTINUATION	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		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 (MNBB 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)	DOCKET NUMBER (2)		LER NUMBER (6)	PAGE (3)		
Indian Point 3	05000286	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 5		
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DESCRIPTION of EVENT

On September 16, 1995, the reactor was in a hot shutdown condition, (reactor power level 0, reactor coolant system temperature of 547 degrees, 2235 psig, pressurizer level at 23 percent). During examination of the spare inboard pipe lines in the ZZ containment penetration, radiographs indicated a through-wall crack on the pipe line C end cap. This same pipe line was examined earlier and found to have a similar through-wall crack and a slight leak on the outboard pipe cap. As a result, both the inboard and the outboard pipe caps on this pipe contained through-wall cracks potentially rendering the line incapable of performing its intended containment integrity function. At 0300 hours, penetration ZZ was declared inoperable and a limiting condition for operation (LCO) for Technical Specification 3.6.A.3 was entered for containment integrity. This LCO requires restoring containment integrity within 1 hour or within the next 30 hours bring the plant to cold shutdown, a total of 31 hours when starting in hot shutdown condition. At 0400 hours, operators entered plant shutdown procedures to proceed to cold shutdown. A one-hour non-emergency report was made to the NRC at 0441 hours (NRC Log# 29342).

The Weld Channel and Containment Penetration Pressurization (WCCPPS) system continuously pressurizes the positive pressure zones incorporated into the containment penetrations and the weld channels over the welds in the containment building steel liner. It also pressurizes the spaces between certain gasketed seals and containment isolation valves. The WCCPPS continuously monitors the integrity of the containment penetrations, containment weld channels, and certain gasketed seals and containment isolation valves and thus, limits radioactive releases in the event of a loss-of-coolant accident when above cold shutdown. Penetration ZZ is required to be pressurized when above cold shutdown. Line C of penetration ZZ was maintained pressurized and considered operable, per Operability Determination 95-041 on September 8, 1995, with a minor leak on its outside pipe cap. On September 15, radiography of the inside containment pipe cap on line C of penetration ZZ showed indication of a through wall crack, but no detectable leak path was apparent. Even though the inside pipe cap did not have a leak path that was detectable, plant management decided to commence a Technical Specification (Section 3.6.A.3) On September 17, 1995, at 0932 hours, the plant required shutdown. achieved cold shutdown.

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CAUSE of the EVENT

The cause of the event was inadequate corrective action due to a limited engineering review of the extent of condition for a containment penetration service water leak in 1989 (see LER 89-009-00). In 1989, the significant occurrence report process was weak in requiring an extent of condition review. Therefore, the engineering review did not specify adequate corrective actions to remove service water from several spare containment penetrations connected to Zone 2 of the WCCPPS. A factor contributing to the inadequate corrective action was that these penetrations were designed without flow through test (drain) connections. Thus, service water was allowed to remain inside a crevice formed by the pipe/cap socket weld on line C of penetration ZZ and other spare penetrations and lines. The stagnant service water contained chlorides and was low in oxygen. This disrupted the protective chromium oxide layer which allowed intergranular cracking due to crevice corrosion to attack the stainless steel caps. Stagnant water in the pressurized spare pipe was leaking through the outside pipe cap as was identified in DER 95-2062 on September 8, 1995. Later, it was determined through radiography that inter-granular corrosion cracking had resulted in indicated flaws in other spare containment pipe caps as well.

CORRECTIVE ACTIONS

In order to prevent recurrence, the following corrective actions have been or shall be taken:

- Implementation of the Deviation Event Report process, analysis methods and training, in 1994, addresses the process weakness that contributed to the limited engineering review performed for 1989 event. This action is complete.
- Service water was drained from all the spare pipes in Penetration ZZ and the pipes were flushed, dried and inspected prior to replacing the caps. This action is complete.
- Pipe caps of penetration ZZ line C and others where flaws were detected have been replaced. This action is complete.

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	The extent of condition is of discovering water lead with welded caps at pener several other problems re- weld channels and associa of the WCCPPS was reviewe 0, dated October 4, 1995 and Weld Channels Found 0 the results of actions ta inspections and tests of water. Essentially all of weld channels was removed containment penetrations pipe caps were radiograph including the three caps replaced. WCCPPS was rest requirements. This action	king from a tration ZZ l elated to th ated component ed in Report , "Condition Containing W aken and comp various WCC of the water d, analyzed, were made as hed and those found with tored to agree h is complete	stainless steel ed to the discov e containment pents. The extent : IP3-RPT-VC-015 of Containment ater." The repo pleted engineeri PPS zones found in suspect pene and the weld ch s dry as practic e found with ind through wall cra ee with the IP3 e.	spare pipe very of enetrations, of condition 94 Revision Penetrations ort summarizes ing to contain etrations and eannels and eal. Suspect licated flaws icks were design			
•	Operations will revise su Test for Water Leakage" t This revision is due Octo Engineering will evaluate	to include to ober 30, 199	esting of the SS 5.	penetration.			
	during the Refueling Outa	age-9 outage		r material			
•	Engineering will evaluate capability to the spare of of other penetrations to water be introduced in th 1996. Engineering will ensure p are dried to lower levels activity will be complete	lines of pene enable drain ne future. ' penetrations s during the	etration ZZ and hing of these li This action is d that have resid Refueling Outag	spare lines nes should lue April 1, lual moisture			

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ANALYSIS of EVENT

The event is reportable under 10 CFR 50.73 (a) (2) (i) (A). The licensee shall submit a License Event Report on the completion of any nuclear plant shutdown required by the plant's Technical Specifications. LER 89-009 reported a similar event involving water being found in the WCCPPS from a leaking service water line.

SAFETY SIGNIFICANCE

This event had no significant effect on the health and safety of the public. No credit is taken for the operation of the WCCPPS System to meet the requirements of 10 CFR 100 limits for the calculation of offsite doses in the plant design basis accident analyses. This is documented in FSAR Sections 6.6.1 and 14.3.5. The WCCPPS is required to be depressurized and vented when 10 CFR 50 Appendix J Type A Integrated Leak Rate Testing (ILRT) is performed. In addition, previous sensitive leak rate testing and Appendix J Type B or C testing, demonstrated leakage past containment isolation barriers was well within Appendix J limits. At the time that the cap flaw was discovered, the vapor containment leak rates were within design basis limits. This was evidenced by the continuous monitoring of WCCPPS leakages. The effect of the continued presence of water or moisture on the carbon steel or stainless steel components, piping and penetrations within the WCCPPS has been evaluated as negligible in Report No. IP3-RPT-VC-01594 Revision 0.

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