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



October 16,1995

IPN-95-106

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 # 95-020-00 "Plant Outside Design Basis Due to a Lack of Compliance With 10 CFR 50, Appendix R"

Dear Sir:

The attached Licensee Event Report (LER) 95-020-00 is hereby submitted as required by 10CFR50.73. This event is of the type defined in 10CFR50.73(a)(2)(ii)(B). Also attached are commitments made by the Authority in this LER.

Very truly yours,

J. HU J. M. Hill Site Executive Officer Indian Point 3 Nuclear Power Plant

Attachment cc: See next page





Docket No. 50-286 IPN-95-106 Page 2 of 2

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

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

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

Docket No. 50-286 IPN-95-106 Attachment 1 Page 1 of 1

Attachment 1 List of Commitments

| Number | Commitment | Due |
|---------------|---|----------------------|
| IPN-95-106-01 | The IP3 Fire Protection Design Basis Document was scheduled for completion by December 29, 1995 in commitment IPN-95-003-04. The schedule for this commitment is being revised to reflect delays due to personnel unavailability. | June 30, 1996 |
| IPN-95-106-02 | An assessment of several questions on the past reportability determination of the Appendix R items will be completed. If any item is determined to be reportable, this LER will be supplemented or a new LER written within 30 days of the determination. | November 13, 1995 |

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DESCRIPTION OF EVENT

On September 25, 1995, at approximately 1830 hours, with the plant in cold shutdown (reactor power level at 0%, reactor coolant temperature at 179 degrees Fahrenheit, and reactor coolant pressure at 375 psig), Licensing concluded that an exemption from 10 CFR 50, Appendix R, Section III.G had been required for the source range instrumentation (IG) configuration in the electrical tunnel. No exemption had been requested. DER 95-2222 was issued to document the determination. No corrective action was required since the condition had been corrected in modification 93-03-373 FBAR.

Licensing evaluated this event and determined that source range instrumentation was credited as safe shutdown process monitoring instrumentation in the 1984 Appendix R Reanalysis submitted to the NRC on August 16, 1984. The Appendix R neutron flux signal instrumentation installed to meet this requirement was modified when modification 86-03-038 NI (declared operable September 17, 1987) added a new two channel neutron flux detection system (channels NI-38 and NI-39) to meet the requirements of Regulatory Guide 1.97. Channels NI-31 and NI-38, which run from the upper penetration area through the upper tunnel to the entranceway, provided the Appendix R signals after the modification. N-31 was protected by a one hour fire barrier from the containment penetration for 20 feet into the upper tunnel with similar protection at the other end of the tunnel (this provided compliance with Appendix R, Section III.G for penetration area and entranceway fires based on an exemption granted February 2, 1984). The NI-38 channel was not protected but was provided with an alternate power supply (JX) and an additional isolated output signal to perform the function of the displaced dedicated Appendix R neutron flux signal. The modification required an operator to enter the upper penetration area to manually transfer to the alternate signal if a fire in the upper cable tunnel damaged channels NI-38 and NI-31 (entrance was also required when a fire outside the cable tunnel (e.g., control room fire) caused a signal loss). The modification was not in compliance with 10 CFR 50, Appendix R because an exemption request is required for operator entry into the fire area where a fire is postulated (see LER 93-031).

Licensing could not identify why the safety consideration associated with operator entry was not considered in the modification. Licensing considered a lack of attention to detail in design change to be the most likely cause. Safety evaluation NSE 86-03-038-NI discussed

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| TEXT (If more space is required, use additional copies of alternate instrumentation for indicate that the effects of | the control a cable tunn | " room fire but did n el fire or the need | ot for an | | | | |
| exemption were considered. The safety evaluation stated that the original Appendix R signal design requirements were exceeded but did not assess whether operator entry to the upper penetration area was acceptable for the upper tunnel fire even though no operator entry was | | | | | | | |
| acceptable for the upper tunnel fire even though no operator entry was required by the initial design. Licensing also concluded that a lack of clear documentation in the 1984 analysis contributed to the failure to properly evaluate operator action in the upper penetration area for | | | | | | | |

a fire in the upper cable tunnel. Additionally, Licensing found that the safety evaluation was not reviewed by personnel who had performed the detailed fire protection analyses or were likely to have detailed knowledge of NRC guidance.

The source range event was item 11 of 58 fire protection items that were documented in the Indian Point 3 Appendix R & Fire Protection Improvement Plan, an Appendix R compliance reassessment. The resolution of these items was reported to the NRC (NYPA letter IPN-95-039 of March 28, 1995) and discussed in NRC Inspection Reports 93-24 and 95-81. An assessment of the reportability of the 58 items was discussed in LER 95-006 but item 11 was not considered reportable (the aggregate was not considered to be reportable but several of the individual items were reported). LER 95-006 mentioned continuing action by NYPA ("note - several questions are still being addressed on issues identified as not reportable"). Licensing identified the reportability of item 11 during a reassessment of background documentation that was initiated because the assessment of reportability done to support LER 95-006 did not document the reasons why 10 CFR 50, Appendix R, Section III.G.2.b were met. The Licensing reassessment documented the reasons and found that no exemption had been granted for entry to the upper penetration area with a fire in the upper electrical tunnel.

CAUSE OF EVENT

The probable cause of the event was personnel error, an inadequate engineering evaluation during the modification process due to an inattention to detail. Contributing causes were the lack of clear documentation in the Appendix R analyses (through 1984) for use in design review and inadequate fire protection knowledge on the part of the reviewers.

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| CORREC | CTIVE ACTIONS | <u>5</u> | | | | | |
| The following actions have be corrective action and prevent | en or are be recurrence | ing po of th | erformed is event: | to prov | vide | | |
| • Modification 93-03-373 FBA | R corrected (| che A <u>r</u> | opendix R | defici | ency. | | |
| No specific corrective acts program to address the pote identified corrective action letter dated June 8, 1994 Reports 93-22, 93-27, 93-29 | ion(s) was de ential cause ons for the c in response t 9 and 93-81. | efined . The lesigr to the | l for the Authorit control findings | desigr cy has progra s of Ir | n control am in a aspection | | |
| The consideration of fire p process has been improved b including the following: | protection in by past and o | n the ongoir | plant moo ng correct | dificat cive ac | ion tion | | |
| To assure long term comp R, the following program completed: Appendix R An updated, the Fire Area d modification review revi Specifications developed 1984 and 1995 reviewed, study performed, safe sh penetration seals reinsp penetration drawings upd implemented. The long t updating and revision of keep them current and re identified. This repeat identified in LER 95-006 The IP3 Fire Protection | liance with matic correc alysis updat rawings revi sed, detaile , plant modi Multiple Hig utdown proce ected/reeval ated and a 1 erm complian the above d flect any ne s a summary Design Basis | the r tive ed, F sed, d fir ficat h Imp dures uated ong t ce pr ocume w iss of co | equiremen actions h ire Hazar procedure e protect ions inst edance Fa revised, , fire ba erm compl ogram req nts and p ues that rrective ment was | ts of ave be ds Ana for ion Op alled ult (M fire rrier iance uires rocedu may be action schedu | Appendix en lysis erational between HIF) barrier program continual res to s led for | | |
| - The 1P3 Fire Protection completion by December 2 schedule for this commit due to emergent work. M draft format and availab | 9, 1995 in c ment is bein ost of the d le for use. | ommit g rev locume | ment IPN- ised to J ntation i | 95-003 une 30 s curr | -04. The , 1996 ently in | | |
| - Appendix R compliance tr Engineering design engin Appendix R compliance st reoccurrence of events s | aining has b eers to fami rategy and t imilar to th | een c liari o hel e one | onducted ze them w p prevent in this | for Nu ith th the report | clear e IP3 . This | | |
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| TEXT (If more space is required, use additional copies of NRC Form 366A) (17) action was undertaken as part of the lessons learned from the reassessment of the James A. FitzPatrick Fire Protection Program This repeats a corrective action identified in LER 94-012. Responsibility for Appendix R compliance has been transferred to Design Engineering. A Fire Protection System Engineer position has been established and is responsible for supporting Design Engineering to monitor and assess Fire Protection and Appendix R compliance issues at IP3. This revises a corrective action identified in LER 93-007. An assessment of several questions on the past reportability determination of the Appendix R items will be completed by Operations by November 13, 1995. If any item is determined to be reportable. | | | | | | | | |

ANALYSIS OF EVENT

This event is reportable pursuant to 10 CFR 50.73(a)(2)(ii)(B). An assessment of the source range instrumentation in the electrical tunnel determined that, for a fire in the upper electrical tunnel, an exemption was required to allow operator entry to the upper penetration area to establish alternate instrumentation. Therefore, the plant had been outside the design basis requirements of 10 CFR 50, Appendix R since modification 86-03-038 NI was declared operable on September 17, 1987 (this modification required operator entry into the upper penetration area during a cable tunnel fire), until the plant outage that was entered March 7, 1993 (modification 93-03-373 FBAR, ECN 5, completed during that outage, eliminated the need for that operator action). This was a period of approximately 5-1/2 years.

Additional events related to fire protection are discussed in LERs 95-001, 002, 003, and 006, 94-010, and 012, 93-007, 018, 022, 029, 031, 037, 038, 041, 051, and 055, and 92-010, 016 and 017.

SAFETY SIGNIFICANCE

The event did not significantly effect the public health and safety.

A loss of source range instrumentation due to a fire in the upper cable tunnel would not prevent boron sampling as an alternate method to assure adequate shutdown margin during the cooldown and cold shutdown phases. Core reload analyses demonstrate the adequacy of

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| Additionally, due to administ combustibles, the fire in the duration. An intense fire in alarm, fire brigade response recovery from the fire, opera instrumentation could be take | rative contr cable tunne the tunnel and automati tor action t n to support | ols which limit l is expected would quickly : c suppression. o initiate alte cooldown and o | t trans to be o initiat After ernate cold sh | sient of short te an r nutdown. |
| The extent of condition has b plant modifications on the sa This assessment, undertaken a Fire Protection Improvement P 24-05 and closed in Inspectio | een assessed fe shutdown s part of the lan, was trac n Report 95- | by evaluating capability of t e Indian Point cked as Unreso 81. | the ef the pla 3 Appe lved It | ffects of ant. endix R & tem 93- |
| SUPPLEMENTAL INF | ORMATION ON | OTHER ITEMS | | |
| This section summarizes the i actions for the 58 items desc being provided in accordance transmittal letter for LER 95 items have been added to incr Point 3 Appendix R & Fire Pro causes associated with the br program that resulted in thes to address fire protection and included the incomplete docum the inadequate review of plan Appendix R analysis, deficien documentation and procedures shutdown. Inspection Report program and Inspection Report implementation of that program by the following desciption o corrective actions made: | tems and enha ribed in LER with the act: -006. Severa ease the iter tection Impro eakdown of the e items. The d safe shutdo entation of the t modification cies in the i that provided 93-24 describ 95-81 describ m to date. f the items a | ancements / con 95-006. This ion identified al previously un numbers to 60 ovement Plan ac ne Appendix R f is plan was dev own issues at D the Appendix R ons for effects 1984 methodolog d insufficient oes the scope of ibes an assess Industry feedba and the enhance | rrective inform in the indocum). The dresse ire prove loped P3 white design guidan of the nent of ack is ements | ve nation is ented e Indian ed the cotection d by NYPA ch basis, ne nce for IP3 the provided / |
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| Embedded Conduits (CND) In Unprotected Manholes/Pull Points Item - No evidence could be found in the 1984 Appendix R analysis that the exposure of embedded cables (CBL) at pull points was considered. Enhancement - A review documented the acceptability of the protection afforded embedded conduit containing shutdown cables: plant areas. Where cables associated with Charging (CB) Pump (P) 33 were exposed in the PAB, marinite board was placed in each of the 3 compartments of Manhole 33 and the cover of the manhole was sealed. Appendix R Analysis Update Item - Following the 1984 analysis, the Appendix R design basis documentation was not maintained current. Enhancement - The corrective actions that addressed this issue were reported in the Indian Point 3 Appendix R & Fire Protection Improvement Plan. This LER repeats a summary of these corrective actions presented in LER 95-006. Control Building (NA) (CB) Air Intake Fire Exposure Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building(NM) / Administrative Service Building (MA) walls. | · . | Enhancement - Additional procedures. Jumpers and operation of one FCU for | guidance was a repair pro a fire were p | added to safe shu cedure to restore provided. | it down the |
| Item - No evidence could be found in the 1984 Appendix R analysis that the exposure of embedded cables (CBL) at pull points was considered. Enhancement - A review documented the acceptability of the protection afforded embedded conduit containing shutdown cables : plant areas. Where cables associated with Charging (CB) Pump (P) 33 were exposed in the PAB, marinite board was placed in each of the 3 compartments of Manhole 33 and the cover of the manhole was sealed. Appendix R Analysis Update Item - Following the 1984 analysis, the Appendix R design basis documentation was not maintained current. Enhancement - The corrective actions that addressed this issue were reported in the Indian Point 3 Appendix R & Fire Protection Improvement Plan. This LER repeats a summary of these corrective actions presented in LER 95-006. Control Building (NA) (CB) Air Intake Fire Exposure Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building(NM) / Administrative Service Building (MA) walls. | 2. | Embedded Conduits (CND) I | n Unprotected | d Manholes/Pull Pc | oints |
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| Appendix R Analysis Update Item - Following the 1984 analysis, the Appendix R design basis documentation was not maintained current. Enhancement - The corrective actions that addressed this issue were reported in the Indian Point 3 Appendix R & Fire Protection Improvement Plan. This LER repeats a summary of these corrective actions presented in LER 95-006. Control Building (NA) (CB) Air Intake Fire Exposure Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building (NM) / Administrative Service Building (MA) walls. | | Enhancement - A review do protection afforded embed plant areas. Where cable 33 were exposed in the PA the 3 compartments of Man sealed. | cumented the ded conduit o s associated B, marinite b hole 33 and t | acceptability of containing shutdow with Charging (CE coard was placed i the cover of the m | the m cables in 3) Pump (P) in each of manhole was |
| Item - Following the 1984 analysis, the Appendix R design basis documentation was not maintained current. Enhancement - The corrective actions that addressed this issue were reported in the Indian Point 3 Appendix R & Fire Protection Improvement Plan. This LER repeats a summary of these corrective actions presented in LER 95-006. Control Building (NA) (CB) Air Intake Fire Exposure Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building (NM) / Administrative Service Building (MA) walls. | 3. | Appendix R Analysis Update | e | • | · · |
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| 4. Control Building (NA) (CB) Air Intake Fire Exposure Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building(NM) / Administrative Service Building (MA) walls. | | Enhancement - The correct were reported in the India Improvement Plan. This Li actions presented in LER 9 | ive actions t an Point 3 A <u>r</u> ER repeats a 95-006. | that addressed thi opendix R & Fire B summary of these | s issue Protection corrective |
| Item - The 1984 Appendix R analysis did not address the adequacy of separation between the CB air intakes and the Turbine Building(NM) / Administrative Service Building (MA) walls. | 4. | Control Building (NA) (CB |) Air Intake | Fire Exposure | |
| | | Item - The 1984 Appendix H of separation between the Building(NM) / Administrat | R analysis di CB air intal tive Service | id not address the kes and the Turbin Building (MA) wal | e adequacy ne ls. |
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| (5-92) | U.S. NULLEAK RE | GULATORT COMMISSION | EXPIRES 5/31/95 | | | |
| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | JICENSEE EVENT REPORT (LER) TEXT CONTINUATION JEXT CONTINUATION | | | | |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) PAGE (3) | | | |
| Indian Po | pint 3 | 05000286 | YEARSEQUENTIAL NUMBERREVISION NUMBER95 020008 OF 24 | | | |
| TEXT (If more s | space is required, use additional copies of | NRC Form 366A) (17 | () | | | |
| | Enhancement - The Turbin Building Walls were adde controlled barriers. The controlled barriers on drawings | ne Building ed to the su hese walls w the fire are | and Administrative Service rveillance program as ere also identified as a / zone arrangement plan | | | |
| 5. | • Emergency Lighting (FH) Actions | or Charging | (CB) Pump 33 Operator | | | |
| · · · | Item - A loss of instrum charging pump speed manu analysis identified Char component but there are this action. | ment air (LD Jally at the rging Pump 33 no emergency |) requires controlling pump. The 1984 Appendix R 3 as a safe shut down 7 lighting units to support | | | |
| | Enhancement - Charging H down list and the Operat operation above cold shu and 32 are operable. | Pump 33 was p cional Speci utdown when 3 | removed from the safe shut fication was revised to limit less than Charging Pumps 31 | | | |
| 6. | Simultaneous Transformer | r (XFMR) Yaro | l/Turbine Building Fire | | | |
| | Item - The 1984 Appendix simultaneous fire involv generator (TB) that coul (SW) pumps. | c R analysis ying the main ld endanger n | did not address a n transformer and the turbine redundant Service Water (BI) | | | |
| | Enhancement - An evaluat . when the resolution of i | tion demonstr tem 2 was co | rated the design adequacy onsidered. | | | |
| 7. | Need To Review 1984 Appe | endix R Analy | vsis Cable Selection | | | |
| | Item - The 1984 Appendi was not readily retrieva | lx R analysis able / docume | s cable selection methodology ented. | | | |
| | Enhancement - The adequa components contained in documented. Discrepanci schedule and plant drawi corrected. Cable select Protection/Appendix R co design changes. | acy of cable the 1984 App les between t ings were res ion adequacy ompliance rev | selection for a sampling of bendix R analysis was the cable and raceway solved and are being vis now assessed during Fire views performed for plant | | | |
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| NRC FORM 366A | U.S. NUCLEAR REGULATO | RY COMMISSION(5-92) | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 | | | | |
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| Indian Po | oint 3 | 05000286 | YEARSEQUENTIAL NUMBERREVISION NUMBER95 020009 OF 24 | | | | |
| TEXT (If more s | space is required, use additional copies of | NRC Form 366A) (17 | 7) | | | | |
| 8. | Mechanical Equipment Sele | ection | | | | | |
| | Item - The adequacy of me Appendix R analysis was c | echanical equ questioned. | uipment selection in the 1984 | | | | |
| | Enhancement - System revi design documentation (DBD and other documentation) mechanical equipment for 24, 25, 26, 27, 28, 29, 3 56, 57, 58, 59, and 60. | ews, includ:)'s, system o were perform Appendix R. 0, 31, 32, 3 | ing review of IP3 system descriptions, flow diagrams ned to identify the required See items 10, 16, 17, 23, 33, 36, 37, 38, 40, 42, 44, | | | | |
| [•] 9. | Prompt Failures | | | | | | |
| | Item - The adequacy of th 1984 Appendix R analysis | e evaluation was question | n of prompt failures in the ned. | | | | |
| | Enhancement - This item w | as resolved | as discussed in item 8. | | | | |
| 10. | Mechanical Failure And Ad Dump Valves (ADVs) | lequacy Of Is | solation Of The Atmospheric | | | | |
| | Item - The 1984 Appendix operation of the ADVs (fa | R analysis d il open) wit | lid not address spurious thout safety injection. | | | | |
| | Enhancement - Safe shut d operator actions. | lown procedur | res were modified to reflect | | | | |
| 11. | Inadequate Source Range S (Reported in this LER.) | eparation Ir | n The Upper Electrical Tunnel | | | | |
| 12. | Local Operator Actions In (PAB) 55' Elevation, Fire | The Plant A Zone 17A | Auxiliary Building (NF) | | | | |
| | Item - A fire in the moto could make the PAB elevat addressed in the 1984 App analysis credits shut dow entry into the area (FZ-1 | r control ce ion and abov endix R anal n from outsi 7A) within t | enter (MCC) 36A&B area that ve inaccessible was not Lysis. The 1984 Appendix R Lde the CR which requires the first hour. | | | | |
| | Enhancement - The shut do from inside the CR utiliz it to the 480V Vital Buse were added to the analysi | wn strategy ing the Appe s. Addition s to support | was changed to shut down endix R Diesel and aligning hal cables and components this alignment. | | | | |

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| NRC FORM 366A (5-92) | U.S. NUCLEAR RE | GULATORY COMMISSION | | APPROVED BY C EXPIRE | MB NO. 315 S 5/31/95 | 0-0104 |
| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | R) | ESTIMAT THIS II FORWARD THE IN (MNBB ·7 WASHING REDUCTI MANAGEM | ED BURDEN PER NFORMATION COLLE COMMENTS REGA FORMATION AND F 714), U.S. NUCLI STON, DC 20555-0 ON PROJECT IENT AND BUDGET, | RESPONSE CCTION REQU RDING BURD ECORDS MAI EAR REGULAT 001, AND T (3150-0104) WASHINGTON | TO COMPLY WITH JEST: 50.0 HRS. EN ESTIMATE TO NAGEMENT BRANCH ORY COMMISSION, O THE PAPERWORK O, OFFICE OF J, DC 20503. |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) | | PAGE (3) |
| Indian Po | pint 3 | 05000286 | year 95 | SEQUENTIAL NUMBER | REVISION NUMBER 00 | 10 OF 24 |
| TEXT (If more | space is required, use additional copies of | NRC Form 366A) (17 | ') | | | |
| 13. | Isolation Of Non-Required | l Systems | | | | |
| | Item - The adequacy of th required systems in the 1 | e evaluation 984 Appendix | n of cRai | the isolat nalysis wa | ion of s ques | non- tioned. |
| | Enhancement - This item w | as resolved | as d | iscussed i | n item | ι 8. |
| 14. | Fixed Emergency Lighting LER 94-012.) | Design In Th | ne Coi | ntrol Room | n (Repo | orted in |
| 15. | Need To Document Safe Shu | it Down Compo | nent: | s By Fire | Zone | |
| | Item - The 1984 Appendix of safe shutdown equipmen actual compliance strateg Analyses used fire zones exemptions. | R reevaluati t and cables y in some fi and sub-zone | on do on a re an es bas | ocumented a fire are reas is di sed on app | the lo a basi fferen proved | cation s. The t. |
| | Enhancement - The Appendi Appendix R analysis ident analysis sub fire zone in 1984 fire areas or zones) documentation is required these deficiencies were d issues. | x R complian ify safe shu some areas . The Appen to aid in l etermined to | ice su it dow (this idix H ong t be a | ummary and wn compone s did not R design b term compl a cause of | the unts by change asis iance the o | pdated an the and ther |
| 16. | Emergency Diesel Generato | r (DG) (EDG) | Fuel | l Tank (TK |) Leve | 1 |
| | Item - The 1984 Appendix level instrumentation. | R analysis d | lid no | ot include | EDG f | uel tank |
| | Enhancement - Additional the Appendix R analysis. and found them to provide operator inspection of th | mechanical g Operations adequate gu e level in E | ages revie idanc DG ur | have been ewed exist ce for the nderground | inclu ing pr perio fuel | ded in ocedures dic tanks. |
| 17. | Switchgear (SWGR) Room Ve 95-006.) | ntilation Re | quire | ements (R | eporte | d in LER |
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| NRC FORM 366A (5-92) | U.S. NUCLEAR RE | GULATORY COMMISSION | | APPROVED BY C | OMB NO. 315 | 0-0104 |
|] | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | ER) | ESTIMAT THIS I FORWARD THE IN (MNBB T WASHING REDUCT) MANAGEN | TED BURDEN PER NFORMATION COLLI O COMMENTS REGA IFORMATION AND I 7714), U.S. NUCL GTON, DC 20555-C ION PROJECT MENT AND BUDGET, | RESPONSE ECTION REQ RDING BURI RECORDS MA EAR REGULA' 001, AND T (3150-0104 WASHINGTON | TO COMPLY WITH UEST: 50.0 HRS. IEN ESTIMATE TO NAGEMENT BRANCH FORY COMMISSION, TO THE PAPERWORK O, OFFICE OF N, DC 20503. |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6 |) | PAGE (3) |
| Indian Poi | nt 3 | 05000286 | year 95 | SEQUENTIAL NUMBER - | REVISION NUMBER 00 | 11 OF 24 |
| | Item - The 1984 Appendix of a loss of PAB ventile ventilation Design Basis ventilation is required The analysis did not add access for alternate sho area and the charging pr | x R analysis ation from f s Document (1 in one hour dress the red ut down actio ump cubicle. | did ires DBD) to c quire on in | not defin in all ar indicated cool safe ments for the pipin | e the e eas. ' that p shutdow person ng pene | effects The portable wn pumps. nnel etration |
| | Enhancements - The PAB Appendix R analysis and to include additional as ventilation. FP-29 has scenario in fire areas (PAB-2 (fire zone 5). F: B area) was also added to portable ventilation. | ventilation s safe shutdow reas within a been revised CTL-3, ETN-4 ire area PAB- to those area | syste wn pr the P d to (fir -2, f as re | m was add ocedures w AB for por specify th e zones 1 ire zone f quiring es | ed to t were ch rtable he fire A and 3 17A (MC stablis | the hanged) and C 36A & shment of |
| 18b. | Control Room (CR) Ventil Item - The 1984 Appendix Heating Ventilating Air cooling to ensure operate potential exists for los | lation Requin x R analysis Conditioning tion of safe ss of CR vent | remen make g (HV shut tilat | ts For App s no refer AC) syster down equin ion fed fr | pendix rence t ns for pment. rom MCC | R to the CR area The C's 36A |

Enhancements - Supplemental air conditioning units have been added to the Appendix R analysis. The circuits were routed independent of fire areas ETN-4 and PAB-2 so supplemental cooling will be available unless there is a loss of offsite power coincident with the fire. Procedures were revised to implement station blackout actions related to CR ventilation for the applicable fire scenarios with loss of offsite power.

18c. Cable Spreading Room (CSR) Ventilation (Reported in LER 95-006.)

19. Loss Of EDG Auxiliaries For An Upper Cable Tunnel Fire

and 36B due to a fire in certain plant areas.

Item - The 1984 Appendix R analysis did not address loss of the exhaust fans for the EDG cells due to an Upper Cable Tunnel fire although the 1984 Appendix R analysis strategy for this fire called for shut down from the CR using the EDG.

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| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | ESTIMATED BURDEN PER RESPONSE TO COMPLY W THIS INFORMATION COLLECTION REQUEST: 50.0 H FORWARD COMMENTS REGARDING BURDEN ESTIMATE THE INFORMATION AND RECORDS MANAGEMENT BRA (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSI WASHINGTON, DC 20555-0001, AND TO THE PAPERW REDUCTION PROJECT (3150-0104), OFFICE MANAGEMENT AND BUDGET, WASHINGTON, DC 20503. | ITH IRS. TO NCH ON, JORK OF | | | | |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) PAGE (3) | | | | |
| Indian Po | int 3 | 05000286 | YEAR SEQUENTIAL REVISION NUMBER NUMBER 95 020 00 12 OF 2 | 24 | | | |
| TEXT (If more s | pace is required, use additional copies of | NRC Form 366A) (17 | ·) | | | | |
| Enhancements - The strategy was changed to shut down from the CR using the Appendix R Diesel Generator aligned to the 480V vital buses instead of the EDGs. Guidance is given to align the Appendix R Diesel to the 480V Vital Buses. The cables and components necessary to accomplish this were included in the Appendix R analysis. | | | | | | | |
| 20. | Alternate Shut Down Fire Cable | Zone 17A Co | ntains Alternate Shut Down | | | | |
| | Item - The 1984 Appendix R analysis did not address reliance on alternate shut down when there is a required shut down cable within 20 feet of the fire. | | | | | | |
| | Enhancements - The strat using the Appendix R Die additional cable and com Analysis and Compliance | egy was chan sel Generato ponents were Procedure, F | ged to shut down from the CF r instead of the EDGs and included in the Appendix R PES-04B. | ર | | | |
| 21. | Inadequate Separation Of Feeds | Service Wat | er (SW) Pump Strainers Power | - | | | |
| | Item - The 1984 Appendix potential loss of automa loss of instrument air o | R analysis tic backwash r control ci | did not identify the ing of the strainers due to rcuits. | | | | |
| | Enhancements - Shut down strainer delta P and man required. Fixed 8 hour intake enclosure to supp the strainer. An exempt security lights for acce | procedures ually backwa emergency li ort local op ion was gran ss and egres | were changed to monitor sh the SW pump strainers as ghts were provided in the eration of equipment and of ted on March 29, 1995 to use s. | 5 | | | |
| 22. | Loss Of Heat Tracing | | | | | | |
| | Item - The 1984 Appendix of loss of heat tracing. Condensate Storage Tank and may not have been av Backwashing of the SW put strainers clog. | R analysis Refueling (CST) tank l ailable if t mp strainers | did not consider the effects Water Storage Tank (RWST) an evel indication are required he instrument lines froze. is needed if and when the | ; 1d 1 | | | |
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| NRC FORM 366A U.S. NUCLEAR RE (5-92) | U.S. NUCLEAR REGULATORY COMMISSION | | | | | |
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| LICENSEE EVENT REPORT (LE TEXT CONTINUATION | ESTIMATED BURDEN PER RESPONSE THIS INFORMATION COLLECTION REQ FORWARD COMMENTS REGARDING BUR THE INFORMATION AND RECORDS MA (MNBB'7714), U.S. NUCLEAR REGULA' WASHINGTON, DC 20555-0001, AND T REDUCTION PROJECT (3150-0104 MANAGEMENT AND BUDGET, WASHINGTOI | TO COMPLY WITH UEST: 50.0 HRS. DEN ESTIMATE TO NAGEMENT BRANCH TORY COMMISSION, TO THE PAPERWORK), OFFICE OF N, DC 20503. | | | | |
| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | PAGE (3) | | | |
| Indian Point 3 | 05000286 | YEARSEQUENTIAL NUMBERREVISION NUMBER95 02000 | 13 OF 24 | | | |
| TEXT (If more space is required, use additional copies of | NRC Form 366A) (17 | ////////////////////////////////////// | | | | |
| Enhancements - Safe shut portable heating units a freezing and to allow ma if required. In additio Procedure(s) for fuel st are being revised and / action is tracked by ACT completion November 1995 1995 to use security lig | down proced s necessary nual backwas n, portable orage / prov or developed S 12976 and . An exempt hts for the | lures were changed to to prevent instrumen h of the SW pump str heating units were p ision and on-site re for these component currently scheduled ion was granted on M above actions. | place t line ainers, rocured. fueling s. This for arch 29, | | | |
| 23. Failure Of The MSIVs To | Close | | | | | |
| Item - The timeliness of 1984 Appendix R analysis questioned. In addition down stream of the valve fire at the MSIVs potent not considered. | Item - The timeliness of closing the MSIVs, as detailed in the 1984 Appendix R analysis, during a Control Building Fire was questioned. In addition, the secondary system isolation valves down stream of the valves may fail. Also, the possibility of a fire at the MSIVs potentially blocking access to the valves was not considered. | | | | | |
| Enhancements - The 1994 . changes were required. | analysis add | ressed the concerns a | and no | | | |
| 24. Adequacy Of Steam Genera is covered by item 10.) | tor PORV Iso | lation Capability (T | his item | | | |
| 25. Need To Trip Reactor Coo | lant Pumps | | | | | |
| Item - The 1984 Appendix that fires in different Reactor Coolant Pumps (Ro Reactor Coolant System (A potential for powering th the RCPs are on, or the seal leakoff, loss of Cor lube oil coolers, loss of seal injection). | R analysis (locations co CPs) due to AB) (RCS) th he bus with loss of suppo mponent Cool f CCW to the | did not address the ould require tripping the depressurization rough open spray value the Appendix R diese ort systems (e.g., lo ing Water (CC) (CCW) thermal barriers and | concern of the of the ves, the while oss of to the d loss of | | | |
| Enhancements - The safe s the RCPs before exiting t accordance with normal op locally, that they have t | shut down pro the CR when o perating proo tripped. | ocedure was revised to operation is not in cedures and to verify | to trip y, | | | |
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| NRC FORM 366A (5-92) | U.S. NUCLEAR RE | EGULATORY COMMISSION | N ATPPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 | | | | |
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| LICENSEE EVENT REPORT (LER) TEXT CONTINUATION | | | ESTIMATED BURDEN PER RE THIS INFORMATION COLLECT FORWARD COMMENTS REGARD THE INFORMATION AND REC (MMBB 7714), U.S. NUCLEAR WASHINGTON, DC 20555-000 REDUCTION PROJECT (31 MANAGEMENT AND BUDGET, WA | ESPONSE TO COMPLY WITH ION REQUEST: 50.0 HRS. ING BURDEN ESTIMATE TO CORDS MANAGEMENT BRANCH R REGULATORY COMMISSION, 1, AND TO THE PAPERWORK 150-0104), OFFICE OF ASHINGTON, DC 20503. | | | |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | PAGE (3) | | | |
| Indian Po | int 3 | 05000286 | YEAR SEQUENTIAL R. NUMBER 95 020 | VISION NUMBER 00 14 OF 24 | | | |
| TEXT (If more s | pace is required, use additional copies of | f NRC Form 366A) (17 | · · · · · · · · · · · · · · · · · · · | · · · · · · · · · · · · · · · · · · · | | | |
| 26. | Need To Repair MOVs Afte | er Spurious F | ailures Due To (| Over Torque | | | |
| | Item - The 1984 analysis did not consider that a fire induced hot short on the valve control circuitry could bypass the push-buttor control room switches and limit/torque switches which could subsequently energize the open/close coil of the valve and could result in the valves being driven beyond their travel limit potentially resulting in potential valve/operator failure. The valve and/or valve operator locked rotor conditions would not have been prevented by the thermal overload relay. The potential damage to the valves could have rendered the valves inoperable (cannot be manually operated locally), created a loss of the pressure boundary and/or created a loose parts problem. Enhancements - Safe shut down procedures were changed to incorporate manual actions to de-energize MOVs to prevent additional spurious actuation and to include a new letdown path. Valve control circuitry was medicied | | | | | | |
| 27. | Need To Trip Non-Require | ed Charging P | umps | | | | |
| | Item -The 1984 Appendix R analysis did not assess whether or not a fire could cause spurious actuation of the charging pumps or suction valves and result in equipment damage (valve actuation with a pump in operation could cause pump damage when running,multiple pumps running could affect the relief valve through overuse, and the loss of letdown could cause the VCT to drain and entrain H ₂ into the charging pump suction lines). | | | | | | |
| | Enhancements - Safe shut guidance to the operator isolating the VCT and al | down proced s for trippi igning the R | ures were change ng the charging WST. | ed to provide pumps, | | | |
| 28. | Potential Damage Due To Closure | Volume Contr | ol Tank (VCT) Is | solation Valve | | | |
| | Item - The 1984 Appendix capability for spurious 112C. Spurious operatio from the charging pumps 27. | R analysis actuation of n of LCV-112 creating the | did not identify motor operated C could have iso problem discuss | y the valve LCV- plated the VCT sed in item | | | |
| | Enhancements - These are | as discusse | d in item 27. | | | | |
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| NRC FURM 366A | U.S. NUCLEAR RE | GULATORY COMMISSION | | APPROVED BY O | MB NO. 315 | 0-0104 |
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| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | R) | ESTIMAT THIS II FORWARD THE IN (MNBB 7 WASHING REDUCTI MANAGEM | ED BURDEN PER FORMATION COLLE COMMENTS REGA FORMATION AND F 714), U.S. NUCLI TON, DC 20555-0 ON PROJECT ENT AND BUDGET. | RESPONSE ECTION REQU RDING BURD RECORDS MA EAR REGULAT 001, AND T (3150-0104) WASHINGTON | TO COMPLY WITH JEST: 50.0 HRS. JEN ESTIMATE TO NAGEMENT BRANCH ORY COMMISSION, O THE PAPERWORK O FFICE OF L DC 20503. |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) |) | PAGE (3) |
| Indian Po | vint 3 | 05000286 | year 95 | SEQUENTIAL NUMBER | REVISION NUMBER 00 | 15 OF 24 |
| TEXT (If more s | pace is required, use additional copies of | NRC Form 366A) (17 | ') · | · · · · · · · · · · · · · · · · · · · | | · · · · · · · · · · · · · · · · · · · |
| 29. | Component Cooling Water | and Charging | Pump | Alignmen | t | |
| | Item - The 1984 analysis Charging Pump to alterna Due to transfer switch d accomplished when the no Due to potential circuit deenergization of the no jeopardizing transfer to | relies upon te shutdown esign, this rmal and alt failures wi rmal feed ca alternate s | align power align ernat thin nnot hutdo | nment of supplies ment can te feeds a the CB, t be assure own power | a CCW for a only b re dee he d, the suppli | and CB fire. e nergized. reby, es. |
| | Enhancements - Safe shut down procedures were changed to provide additional operator procedural guidance for transfer. | | | | | |
| 30. | Residual Heat Removal Pu | mp Operation | Unde | er Degrade | d Cond | itions |
| | Item - The 1984 Appendix capability for associate pumps during degraded co power, and no seal cooli making the pump(s) unava | R analysis d circuits t nditions (mi ng) which co ilable for c | did n o spu ni fl uld l old s | ot identi riously a ow condit ead to pu hut down. | fy the ctuate ions, o mp dama | the RHR degraded age, |
| | Enhancements - Safe shut adequate guidance is pro of the RHR system pumps, within the first hour of | down proced vided to the and secure a fire even | ures oper at le t, as | were chan ators to n ast one o required | ged to monito: f thes | ensure r status e pumps |
| 31. | Spurious Operation Of Co | ntainment Sp | ray (| BE) (CS) | Pumps | |
| | Item - The 1984 Appendix capability for spurious have depleted the RWST i | R analysis actuation of nventory in | did n the appro | ot identi CS pumps ximately | fy the which o one hou | could ur. |
| | Enhancements - Safe shut adequate guidance is pro status and trip the CS p spurious start of the pur | down proced vided to the umps in the mps. | ures oper event | were chang ators to i of a fire | ged to monito: e-induc | ensure r pump ced |
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| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | ER) | ESTIMAT THIS I FORWARD THE IN (MNBB 7 WASHING REDUCTI MANAGEM | TED BURDEN PER NFORMATION COLLE OCOMMENTS REGA FORMATION AND F 7714), U.S. NUCLE TON, DC 20555-0 ON PROJECT IENT AND BUDGET, | RESPONSE CTION REQU RDING BURC ECCORDS MA EAR REGULAT 001, AND T (3150-0104) WASHINGTON | TO COMPLY WITH UEST: 50.0 HRS. DEN ESTIMATE TO NAGEMENT BRANCH FORY COMMISSION, O THE PAPERWORK O, OFFICE OF J, DC 20503. |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) |) | PAGE (3) |
| Indian Po | int 3 | 05000286 | year 95 | SEQUENTIAL NUMBER | REVISION NUMBER 00 | 16 OF 24 |
| TEXT (If more s | pace is required, use additional copies of | ⁴ NRC Form 366A) (17 | `) | | | |
| 32. | Spurious Operation Of Sa | fety Injecti | on (I | BQ) (SI) P | umps | |
| | Item - The 1984 Appendix capability for spurious complicate cooldown with control or, when RHR is and /or RHR due to overp | R analysis actuation of respect to established, pressurizatio | did r the RCS i lead n. | not identi SI pumps inventory d to failu | fy the which and pr re of | could essure the RCS |
| | Enhancements - Safe shut adequate guidance is pro status and trip the SI p spurious start of the pu decreasing below SI actu | down proced wided to the umps in the mps or prior ation set po | ures oper event to t int. | were chan ators to of a fir the RCS pr | ged to monito e-indu essure | ensure r pump ced |
| 33. | Spurious Safety Injectio Signal (SIS/CIS/CS) | n/Containmen | t Isc | lation/Co | ntainm | ent Spray |
| | SS. Sparrous safety injection/containment isofation/containment sprassing (SIS/CIS/CS) Item - The 1984 Appendix R analysis did not identify the capability for spurious actuation of the SIS and/or the phase A and B CIS and/or CS which could lead to valves, pumps and/or breakers changing state. The signals could start the Auxiliary Feedwater (BA) (AFW) pumps (operator action required to stop), trip the charging pumps (operator action required to restart), trip the CCW pumps (operator action required to restart), trip the CCW pumps (operator action required to restart), start the CS pumps and open discharge valves 866A and B (operator action required to stop), trip the PAB and VC purge exhaust fans (operator action required to restart), trip MCC 32, 33, 37 and 39 breakers (operator action required to stop), open valves 1835A and H and 1852A and B (no action required for BIT valves), close valves 769, 789, 797 and FCV 625 on phase B (operator action required to reopen), and trip non essential SW pumps 37, 38, and 39 (operator action required to start non-essential pumps or cross connect bedevalued and action required to start non-essential pumps or cross connect | | | | | |
| | Enhancements - Safe shut FP-1A revised to explain or reset the SIS/CIS/CS | down proced operator ac signal. | ures tion | were chang to re-alig | ged and gn com | d ONOP- oonents |
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| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | :R) | ESTIMATE THIS INF FORWARD THE INFC (MNBB 77 WASHINGT REDUCTIO MANAGEME | D BURDEN PER ORMATION COLLE COMMENTS REGAI DRMATION AND R 14), U.S. NUCLE ON, DC 20555-00 N PROJECT (N PROJECT (N AND BUDGET, | RESPONSE CTION REQU RDING BURD ECORDS MA AR REGULAT 001, AND T 3150-0104) WASHINGTON | TO COMPLY WITH JEST: 50.0 HRS. VEN ESTIMATE TO NAGEMENT BRANCH FORY COMMISSION, O THE PAPERWORK O, OFFICE OF J, DC 20503. | |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) | | PAGE (3) | |
| Indian Po | int 3 | 05000286 | year 95 | SEQUENTIAL NUMBER | REVISION NUMBER 00 | 17 OF 24 | |
| TEXT (If more s | pace is required, use additional copies of | NRC Form 366A) (17 | 7) | | | | |
| 34. | 480V Supply and Bus Tie | Breaker Loca | l Oper | ration | | | |
| | Item - The 1984 Appendix R analysis compliance strategy for an upper cable tunnel (Fire Zone 60A) and PAB (Fire Zone 17A) fire relied on the ability to power the 480V emergency switchgear (Vital Buses) from the Appendix R Diesel. The analysis did not demonstrate that remote control of the 480V supply and tie breakers (offsite power supply breakers to the 480V emergency switchgear as well as the tie breakers between emergency switchgear cannot be locally closed). | | | | | | |
| | Enhancements - Remote co and safe shut down proce | ntrol of the dures were c | break hanged | to refle | demons ect th | trated is. | |
| 35. | Need To Start Appendix R | Diesel for | T _c and | T _h | | | |
| | Item - The 1984 Appendix Appendix R diesel to pow | R analysis er just two | requir instru | res start: uments (i | ing the | e $_{\rm c}$ and $T_{\rm h}$). | |
| | Enhancements - A decisio | n was made t | o make | e no enhai | ncement | ts. | |
| 36. | Effects Of CO ₂ System Act | uation On Sa | afe Sh | ut Down Ç | apabil | .ity | |
| | Item - The 1984 Appendix potential for and evalua operation and operator a operation. | Item - The 1984 Appendix R analysis did not identify the potential for and evaluate the effects on safe shut down system operation and operator access as a result of spurious CO_2 system operation. | | | | | |
| | Enhancements - A documented analysis of CO ₂ system circuitry identified that possible spurious discharges could occur in the generator exciter housing, at the turbine and generator bearings, in the cable spreading room (CSR), 480V switchgear room (SR), at the main boiler feed pumps and in the EDG cells. The pre-fire plans and safe shut down procedures were changed to provide the Fire Brigade and operator with guidance on ventilation and preventative mitigating actions. | | | | | | |
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| NRC FURM 366A | U.S. NUCLEAR R | EGULATORY COMMISSION | ir | APPROVED BY C | MB NO. 315 | 0-0104 |
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| | • • • | | ESTIMAT THIS I | TED BURDEN PER NFORMATION COLLE | RESPONSE | TO COMPLY WI UEST: 50.0 HR |
| | LICENSEE EVENT REPORT (LI | ER) | FORWARD | COMMENTS REGA | RDING BURD | DEN ESTIMATE |
| | TEXT CONTINUATION | | (MNBB | 7714), U.S. NUCLI | EAR REGULA | TORY COMMISSIO |
| | | | REDUCT | ION PROJECT | (3150-0104) |), OFFICE |
| · | FACILITY NAME (1) | DOCKET NUMBER (2) | MANAGEN | IED NUMBED (A | WASHINGTO | N, DC 20503. |
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| Indian Po | pint 3 | 05000286 | 95 | NUMBER | NUMBER | 10 07 0 |
| | | | 22 | 020 | 00 | 18 OF 2 |
| TEXT (If more s | space is required, use additional copies o | f NRC Form 366A) (17 | // // | | · · · · · · | <u> </u> |
| | | | _ | | | |
| 37. | Inadequate Definition Of | Service Wat | er Re | equirement | S. | |
| | Item - The 1984 Appendix | c R analysis | did r | not identi | fy the | offorts |
| | of loss of instrument a | r (LD) to th | le SWS | S control | valves | (loss o |
| | air requires manual acti | lons to suppo | ort us | se of one | SW pum | p and, |
| | for SW Pump 38, manual a | action is req | uirea | d before p | ump_st | art to |
| | remove unnecessary loads | prior to pu | ımp st | tart to av | oid ru | nout) an |
| | tomporature of OFOR (dia | lect the effe | cts (| of a river | water | |
| | NPSH | charge canar | at I | 10 [°] F) on s | ingie | pump |
| | | · · | | | | |
| | Enhancements - Safe shut | down proced | lures | were chan | ged to | indicat |
| | that multiple normal SWS | 5 pumps are r | equir | red for no | rmal f | ire |
| | related shutdown, manual | ly close the | SWS | valves to | suppo | rt use o |
| | (isolato flow to ECUa ar | ump No. 38) f | or al | lternative | shutd | own |
| | requirements of the IIIti | mate Heat Si | nk te | emperature | incre | tional |
| | 95°F. | made nead of | | mperature | THEFE | use co |
| | | | | · · · | | |
| -38 | Main Feedwater (SJ) Pump | o Trip | | | | |
| | Item - The 1984 Appendix | r D analyzaia | a:a - | ot oddrog | - + h | |
| - | main feedwater isolation | to prevent | overf | illing th | s the : a staar | need ro: m |
| | generators and causing a | n excessive | coold | lown of th | e BCS. | Upon |
| | initiation of a reactor | trip, automa | tic s | signals to | isola | te the |
| | main feedwater system ac | tuate. Howe | ver, | because m | ain fe | edwater |
| | isolation is an automati | c function i | nitia | ated by the | e reac | tor trip |
| | alternate means might be | realted for a | n App | pendix R e | vent a: | nd |
| | arcemate means might be | e required. | | | | |
| | Enhancements - An analys | is was perfo | rmed | and no en | hancem | ents were |
| | required. | · · | | | | |
| 2.0 | | | 7 - | | | |
| 39. | Emergency Lighting for C | ST / RWST Le | vel 1 | Indication | | |
| | Item - The 1984 Appendix | R Reevaluat | ion i | dentifies | the C | ST and |
| • | RWST level instrumentati | on as instru | ments | selected | to en | sure the |
| | safe shutdown capability | . Appendix | R Sec | tion III. | J requ | ires 8 |
| | hour battery backed emer | gency lighti | ng un | its to su | pport | the |
| | operation of safe shutdo | wn equipment | and | tor acces | s and a | egress |
| · | the CST and RWST or on t | ncy lights a the access / | re no | ot current | iy ins | called a |
| | the cor and rwor or on t | The access / | egres | s pacins. | | |
| | Enhancements - An evalua | tion showed | that | no enhanc | ements | were |
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| Territoria | | · · · · · · · · · · · · · · · · · · · | . ' | | · · | | | |
| NRC FURM 366A (5-92) | U.S. NUCLEAR RE | GULATORY COMMISSION | | APPROVED BY O EXPIRE | MB NO. 315 S 5/31/95 | 0-0104 | | |
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| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) |) | PAGE (3) | | |
| Indian Po | pint 3 | 05000286 | year 95 | SEQUENTIAL NUMBER | REVISION NUMBER 00 | 19 OF 24 | | |
| TEXT (If more s | space is required, use additional copies of | NRC Form 366A) (17 | 7) | | | | | |
| 40. | Loss Of Hydrogen Seals | | | | | · . | | |
| | Item - The 1984 Appendix that could incapacitate Oil System (LL), includi bearing damage and hydro | R analysis the Turbine ng the DC em gen leakage | did n (TRB) Nergen at th | ot addres Generato cy oil pu e seals. | s a CR r (GEN mp res | fire) Lube ulting in | | |
| | Enhancements - The safe the generator. | shutdown pro | cedur | es were c | hanged | to vent | | |
| 41. | CST Heat Tracing (This i | tem is cover | ed by | item 22. |) | : : | | |
| 42. | Failure Of Low Pressure Bypass Steam Dump System | | | | | | | |
| | Item - The 1984 Appendix R analysis did not address that, for a CB fire scenario, the power supplies to the low pressure steam bypass valves and the control circuitry of the main generator output breaker may be adversely affected. A postulated event which simultaneously prevents the low pressure steam bypass dump valves from opening and a failure of the main generator output breaker time delay could potentially cause a turbine overspeed condition. | | | | | | | |
| | Enhancements - An analys required. | is was perfo | rmed a | and no enl | hanceme | ents were | | |
| 43. | Associated Circuits By C | ommon Enclos | ure | | | | | |
| | 43. Associated Circuits By Common Enclosure Item - The 1984 Appendix R analysis did not address that fire- induced faults in non safe shutdown circuits which are not properly fused/protected can potentially result in high fault currents potentially resulting in damage to adjacent cables. This is a potential concern when any such circuits share common raceways with safe shutdown circuits. The 1984 Appendix R analysis approach was to ensure that any cables that share a common enclosure with safe shutdown equipment have adequate electrical protection via circuit breakers, fuses or current limiting devices that will prevent the occurrence of electrically induced secondary fires. No documentation or evaluation has been located that would support this approach. | | | | | | | |
| | Enhancements - An analys: required. | is was perfo | rmed a | and no enh | nanceme | ents were | | |

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| NRC FORM 366A (5-92) | U.S. NUCLEAR R | EGULATORY COMMISSION | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 |
| | LICENSEE EVENT REPORT (L) TEXT CONTINUATION | ER) | 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 (MMBB 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 Pc | pint 3 | 05000286 | YEARSEQUENTIAL NUMBERREVISION NUMBER95 0200020 OF 24 |
| TEXT (If more s | space is required, use additional copies o | of NRC Form 366A) (17 | ⁽) |
| 44. | PRT Rupture Disc Failur | e / VC Habita | bility |
| | Item - The 1984 Appendix fire-induced transients be added to the Pressur ultimately cause the tar contents to be exposed to Enhancements | x R analysis can cause ho izer Relief T nk rupture di to the contai | did not address that numerous t RCS fluid and / or steam to ank (PRT). This can sk to fail causing the nment environment. |
| | required. | sis was perio | Imed and no enhancements were |
| 45. | RWST Heat Tracing (This | s item is cov | ered by item 22.) |
| 46. | Classification Of Safe S | Shut Down Equ | ipment As Non-Category I |
| | Item - The 1984 Appendix ventilation and portable shutdown. Licensing Ame Technical Position (BTP) Protection Quality Assur provided in IP3 Administ | k R analysis e communicati endment No. 2 9.5-1 guida rance. Imple crative Proce | relies upon portable ons equipment to support safe 4 commits to utilize Branch nce with respect to Fire mentation of this guidance is dure AP-16. |
| | Enhancements - Equipment to QA Category M to prov criteria are met. This for completion December immediate action since t been purchased as such i 1/2", 2", 2-1/2"; lined fittings wyes, siamese equipment, including eje portable electric genera floodlights; portable, h communications equipment and, turn-out gear and S | will be rec vide document is being tra 31, 1995. T the equipment in the past. or unlined); connections a ector, smoke ators, includ hand-held rad c; portable f SCBA. | lassified from Non-Category I ation requirements that UL cked in ACTS 5567 scheduled he schedule does not require is standard (UL/RM) and has Included are: fire hose (1- hose nozzles, adapters, nd gate valves; smoke removal tunnels and door bars; ing wire reels, adapters and ios and safe shutdown ire extinguishers, and foams; |
| 47. | CR Lighting (This item i | s covered by | item 14.) |
| 48. | LER For Appendix R Open | Issues | |
| | Item - The items determi | ned reportab | le should be reported. |
| | Enhancements - LERs issu identified next to the i | ed for repor ndividual it | table items have been ems. |

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| | FACILITY NAME (1) | DOCKET NUMBER (2) | | LER NUMBER (6) |) | PAGE (| 3) |
| Indian Po | int 3 | 05000286 | year 95 | SEQUENTIAL NUMBER 020 | REVISION NUMBER 00 | 21 OF | 24 |
| EXT (If more s | pace is required, use additional copies of | [•] NRC Form 366A) (17 | `) | " | | | |
| 49. | RCS Pressure Control | | | . , | | | |
| | <pre>item - Appendix R refles pumps through seal injec pressure above the minim subcool margin. The 198 specifically address how RHR initiation. Relianc complicates operator res minimize make-up to an e will not be compressed. have not been assured av Analysis considers the c Enhancements - The safe provide operators with g not expected to be achie lighting design basis wa</pre> | s on inventor tion as a me um pressure 4 Appendix R 7 the RCS wil 2 on ambient ponse as it 2 stent that t In addition railable for complete loss shutdown pro uidance if e ved within 2 s revised. | y add ans o requi anal l be loss requi he pr , the fires of p cedur ntry 9 hou | f maintai red for s ysis did depressur es for th res the o essurizer pressuri . The Ap ressurize es were c into RHR rs and th | m the ning t uffici not ized t jerato steam zer he pendix r heat hanged condit e emer | chargi he RCS ent o supp pose r to bubbl aters R ers. to ions i gency | ort e |
| 50. | CCW For Thermal Barriers | Or Letdown | For V | olume Con | trol | | |
| | Item - The 1995 Appendix R Compliance Summary documents that Reactor Coolant Pump (RCP) seal integrity is maintained by ensuring the availability of either seal injection via a charging pump or thermal barrier cooling via a CCW pump. Initially, Reactor Coolant System (RCS) shrink during cooldown and available space in the pressurizer would accommodate seal injection flow. The 1984 Appendix R analysis did not address that, in the latter phases of cooldown, there may be insufficient RCS shrinkage and pressurizer steam space to accommodate the required seal injection flow. This can result in the RCS being driven water solid prior to Residual Heat Removal (RHR) cut in and also result | | | | | | |
| | Enhancements - Safe shut steps are taken to estab injection when necessary utilize the RPV Head Ven while providing seal inj letdown. | down procedu lish CCW and to prevent ts if require ection with | res w decr the R ed to loss | ere chang ease / is CS from g reduce R of normal | ed to olate oing s CS inv and e | ensure seal olid o entory xcess | r |
| | | | | * <u>-</u> | | | |
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| NRC FORM 366A (5-92) | U.S. NUCLEAR RE | EGULATORY COMMISSION | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 | | | | |
| | LICENSEE EVENT REPORT (LE TEXT CONTINUATION | ER) | 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 2053 | | | | |
| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) PAGE (3) | | | | |
| Indian Po | vint 3 | 05000286 | YEARSEQUENTIAL NUMBERREVISION NUMBER95 02000220F24 | | | | |
| TEXT (If more s | space is required, use additional copies of | F NRÇ Form 366A) (17 |) | | | | |
| 51. | RCS Hot Leg Flow Path | | | | | | |
| | Item - The 1984 Appendix R analysis did not identify that the sample lines coming from RCS hot leg loop 1 and 3 have normally open flow paths which discharge to the VCT. This could divert primary coolant to the VCT if these air operated valves fail to close and may create a post fire inventory problem for both the VCT and the RCS. | | | | | | |
| | Enhancements - An evalu were required. | ation was pe | rformed and no enhancements | | | | |
| 52. | Spurious Operation of th | Spurious Operation of the Boric Acid Transfer (BAT) Pump | | | | | |
| | Item - The 1984 Appendix R analysis did not identify the spurious actuation of the BAT pump which would result in injection into the charging pump suction lines. The BAT pumps could spuriously inject 12% boric acid into the charging pumps suction piping. Under Appendix R conditions this 12% boric acid could precipitate and block the suction line sufficiently to interfere with charging pump operation and / or form crystals that could block seal injection by clogging the seal injection filters. | | | | | | |
| | Enhancements - Safe shut adequate guidance is pro Pumps. | down proced vided to the | ares were changed to ensure operators to trip the BAT | | | | |
| 53. | CVCS Injection Flow Path | | | | | | |
| | Item - The 1995 Appendix to maintain RCP seal inte either seal injection flo cooling via CCW pump. The seals contain certain MOV Appendix R. | Item - The 1995 Appendix R Compliance Summary indicates the need to maintain RCP seal integrity by ensuring the availability of either seal injection flow via a charging pump or thermal barrier cooling via CCW pump. The CVCS injection flow path to the RCP seals contain certain MOVs that are required to be open for Appendix R. | | | | | |
| | Enhancements - The addit: 442, 443, 444, MOV-250A, Appendix R analysis. | Enhancements - The additional cables and components (MOV-441, 442, 443, 444, MOV-250A, B, C, and D) have been included in the Appendix R analysis. | | | | | |
| 54. | Diesel Fuel Transfer Syst | tem (DE) Leve | el Control | | | | |
| | Item - The 1984 Appendix | R analysis o | lid not identify that the | | | | |
| | | | | | | | |

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| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) PAGE (3) | | | |
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| TEXT (If more s | pace is required, use additional copies of | NRC Form'366A) (17 | · · · · · · · · · · · · · · · · · · · | | | |
| | diesel fuel transfer sys per day tank. Either le the day tank, therefore, tank must be closed. | tem relies c vel control to terminat | on two level control valves valve can allow fuel to enter e the flow, both valves to a | | | |
| | Enhancements – An evalu were required. | ation was pe | rformed and no enhancements [,] | | | |
| 55. | EDG Exhaust Fan Dampers | | | | | |
| | Item - The 1984 Appendix R analysis did not consider that each EDG Room exhaust fan unit is provided with an air/motor operated damper (DMP) which fails closed on loss of air. The EDG Room Ventilation System includes an air/motor operated inlet louver (LV) for each EDG room. These louvers were not included in the 1984 Appendix R analysis safe shutdown components list. | | | | | |
| | Enhancements - The EDG r 318) were added to the s / Appendix R Compliance | oom Inlet lo afe shutdown Procedure, F | uvers (L-316, L-317 and L- analysis and Fire Protection PES-04B, component lists. | | | |
| · 56. | The Main Steam connection represents a leak path | n to the ste | am driven Boiler Feed Pump | | | |
| | Item - The 1984 Appendix steam connection to the as a leakage path from t | R analysis steam driven he SG. | did not document the main main boiler feedwater pump | | | |
| | Enhancements - The auto Appendix R analysis and Compliance Procedure, FP | stop trip ha in the Fire ES-04B. | s been included in the Protection / Appendix R | | | |
| 57. | CCW Pump Runout | | | | | |
| | Item - The 1984 Appendix potential for the CCW pu | R analysis mp to run-ou | did not identify the t as a potential problem. | | | |
| | Enhancements - An evalua were required. | ation was pe | rformed and no enhancements | | | |
| 58. | SG level indication | | | | | |
| | Item - During the 1995 Ap that all wide range Steam | ppendix R re n Generator | assessment it was determined (SG) level sensors may be | | | |

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| | FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) PAGE (3) | |
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| | lost for a fire. This co shutdown strategy for al wide range SG level sens | ndition was l plant area ors. | contrary to the analyzed as which relied exclusively c | |
| | Enhancements - The Appendix R analysis was revised to include narrow range SG level sensors and auxiliary feed water flow indication. Plant procedures were revised to reflect this strategy. | | | |
| 59. | SG level indication | | | |
| | Item - For a fire in the upper penetration area, the 1984 Appendix R Analysis relied upon loop 4 for decay heat removal. The availability of wide range SG level indication and wide range hot and cold leg temperature indication for loop 4 was ensured by protecting the cables associated with these instruments located in the upper penetration area with a one hour barrier. The turbine driven AFW pump was relied upon for SG inventory control as the power feeders for the motor driven AFW pump 33 was located in this area and subject to fire damage. The 1984 Appendix R Analysis did not consider the effects of the turbine driven AFW pump receiving steam only from SGs 32 and 33. Wide range and narrow range SG level indication on these SGs as well as AFW flow indication was not included in the analysis and its availability was indeterminate. Consequently, inadequate process monitoring instrumentation was available to support the shutdown strategy. | | | |
| . • • | Enhancements - The Appendix R Analysis was revised to include narrow range SG level indication and AFW flow indication. In addition, plant procedures were revised to provide the operators with additional guidance. | | | |
| 60. | AFW pump local operation | | | |
| | Item - The 1984 Appendix locally operate an AFW pu failures for a fire in the modification was implement main breaker at the association | R analysis ump due to po he AFW pump : nted to perm ciated Switc! | identified the need to otential control circuit room. As a result, a it local operation of the hgear. | |
| | Enhancements - Safe shute guidance to the operators locally and additional 1 | down procedu: s to operate ights were ad | res were changed to provide the motor driven AFW pumps dded at the switchgear. | |