

**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
-------------------------------------	--	-------------------------------	--------------------

TITLE (4) The Fuel Storage Building Emergency Ventilation System Was Inoperable During Movement of the Cask Crane Over the Spent Fuel Pit Due To Failure To Perform All Required Testing; A Condition Prohibited By Technical Specifications

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
04	25	97	97	-- 004 --	00	05	27	97	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) 100	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER (Include Area Code)
NAME Mark Pearson, Operations Manager		(914) 736-8201

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 April 25, 1997, with the plant at 100 percent power and normal temperature and pressure, Operations concluded the Fuel Storage Building (FSB) Emergency Ventilation System (EVS) was inoperable because all testing required by Technical Specifications (TS) 4.5.A.6.c was not performed. On April 17, 1997, as a result of a chemical release during roof repair, the TS for the FSB EVS was entered and the charcoal adsorber filter (HECA) tested. The particulate (HEPA) filters were not tested because only the HECA was considered to be potentially affected by a chemical release. After successful testing of only the HECA, the FSB EVS was declared operable on April 19, 1997, and cask crane was allowed to be moved over the spent fuel pit. The NRC questioned the operability of the FSB EVS on April 24, 1997, after observing that all the testing identified in the TS was not performed. After further evaluation, operations concluded that all TS required testing should have been performed and declared the FSB EVS inoperable. TS requires the FSBEVS to be operable whenever irradiated fuel is being handled or the spent fuel cask or cask crane is moved over the spent fuel pit. Because the FSB EVS was not tested in accordance with the TS and subsequently considered to be inoperable during the time the cask crane was allowed to be moved over the spent fuel pit, a condition prohibited by TS existed. The cause was personnel error due to failure to follow the wording in the TS. Corrective actions include performing a complete test of the filter system, issuing a shift order notifying operators of the requirements of the TS, instruct licensed operators on use of TS section 4; and changes to applicable test procedures. This event had no affect on the health and safety of the public.

**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 97	SEQUENTIAL NUMBER -- 004 --	REVISION NUMBER 00	2 OF 5

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

Note: The Energy Industry Identification System Codes are identified within the brackets { }

**DESCRIPTION OF EVENT**

On April 25, 1997, at approximately 1420 hours, Operations concluded that the Fuel Storage Building (FSB) {ND} Emergency Ventilation System (EVS) {VG} was inoperable because all the listed actions in Technical Specifications (TS) 4.5.A.6.c were not performed for a chemical fume event on April 17, 1997. Because the FSB EVS was declared operable on April 19, 1997 without performing all tests listed in the TS and the cask crane {LR} was moved over the spent fuel pit during the time the FSB EVS was considered inoperable, a condition prohibited by TS 3.8.C.6 existed. At the time of the event discovery on April 25, 1997, the plant was at 100 percent reactor power, approximate Reactor Coolant System (RCS) temperature and pressure were 567 degrees F and 2235 psig, and pressurizer level approximately 46 percent.

During repairs to the roof of the FSB on April 16, 1997, fumes from the repair sealant were drawn into the FSB by the 31 FSB supply fan and detected by workers during fuel handling activities. Health Physics (HP) initiated an investigation into the cause of the fumes and discovered the fumes were from a roof sealant being applied by contractors under a minor maintenance work request. Operations reviewed and authorized the work in accordance with the work control process. The Performance and Chemistry departments were notified of the detection of chemical fumes and a review performed to identify the volatile component from the sealant's Material Safety Data Sheet (MSDS Code No. X81AF). Chemistry's assessment and consultation with the manufacturer determined the fumes were an aliphatic hydrocarbon (mineral spirits). Chemistry confirmed the chemical was on the approved chemical list, (ACL No. 95444) and used in accordance with the chemical control program. The FSB EVS was aligned to provide flow through the system's High Efficiency Particulate Adsorbers (HEPA) {ADS} and High Efficiency Charcoal Adsorbers (HECA) because of movement of the cask crane over the spent fuel pit containing irradiated fuel. With ventilation flow through the HECAs, Performance and Chemistry judged the chemical fumes had the potential to affect the HECA portion of the FSB EVS and notified Operations.

Operations concluded the chemical fumes could have altered the integrity of the HECAs and declared the FSB EVS inoperable and entered a Limiting Condition for Operation (LCO 97-0582) for TS 3.8 at approximately 1100 hours.

**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
		97	-- 004 --	00
				3 OF 5

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

TS 3.8.C.6 requires during fuel handling and storage operations that the FSB EVS be operable whenever irradiated fuel is being handled within the FSB. The EVS may be inoperable when irradiated fuel is in the FSB, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are being moved over the spent fuel pit during the periods of inoperability. A Work Request (WR) for testing only the FSB charcoal filter (HECA) was authorized by a Control Room Supervisor (CRS) on April 18, 1997. TS 4.5.A.6.c requires four conditions to be demonstrated before the FSB ventilation system can be considered operable; prior to handling of irradiated fuel, or at any time fire, chemical releases or work done on the filters could alter their integrity, or after every 720 hours of charcoal adsorber use since the last test. The four conditions includes a methyl iodine test and freon test of the charcoal filter (HECA), a DOP test of the HEPA filters, and a visual inspection.

Testing of only the HECA was performed using the applicable sections of test procedure 3PT-R32A, "Fuel Storage Building Filtration System." Upon satisfactory completion of only the HECA test, the Shift Manager (SM) declared the FSB EVS operable and exited the TS LCO at approximately 1138 hours on April 19, 1997. On April 25, 1997, at approximately 0840 hours, the cask crane was moved over the spent fuel pool.

On April 24, 1997, during an NRC engineering inspection, an inspector questioned the operability of the FSB EVS because not all action statements of TS 4.5.A.6.c were performed. Licensing researched the issue and ascertained that the FSB EVS had been declared inoperable for a chemical fume event on April 17, 1997, and the system returned to service without performing all the tests identified in TS 4.5.A.6.c. Operations was consulted on the basis for not performing all the testing required by TS 4.5.A.6.c. Operations judged that chemical fumes "could alter the integrity" of only the charcoal filters in accordance with the wording of TS 4.5.A.6.c therefore, only the tests for the HECA were performed. Following further review and evaluation of the phraseology of TS 4.5.A.6.c, the FSB EVS was declared inoperable on April 25, 1997, at approximately 1420 hours. During the time the FSB EVS was considered operable, the cask crane had been moved over the spent fuel pit. Because the FSB EVS was not demonstrated to be operable in accordance with the wording of TS 4.5.A.6.c, and the cask crane had been over the spent fuel pit, a condition prohibited by TS 3.8.C.6, was considered to have existed.

**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
		97	-- 004 --	00
				4 OF 5

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

**CAUSE OF EVENT**

The event was caused by personnel error due to document use practices. The Shift Manager (SM) failed to correctly understand and therefore, to follow the phraseology in TS 4.5.A.6.c. The SM approved the work after completion of tests on the HECA only, declared the system operable and exited the LCO. After declaring the FSB EVS operable, the cask crane was allowed to be moved over the spent fuel pit resulting in the violation of TS 3.8.C.6.

**CORRECTIVE ACTIONS**

The following corrective actions have been or will be performed to address the causes of this event:

- The FSB EVS was tested satisfactorily in accordance with TS 4.5.A.6.c and declared operable on April 27, 1997.
- Until TS 4.5.A.6.c is revised the test procedure for the FSB EVS, 3PT-32A will be revised to note that when declaring the FSB EVS inoperable for the conditions listed in TS 4.5.A.6.c, then each of the four tests identified in TS 4.5.A.6.c shall be performed. The procedure is scheduled to be revised by May 31, 1997.
- Operations issued a Shift Order notifying the operations staff of the issue and the requirement to perform all the tests of TS 4.5.A.6.c when conditions (fire, chemical release or work on the filters could alter their integrity) invoke TS 4.5.A.6.c.
- The Operations Manager will instruct licensed operators on the use of TS section 4 before declaring a system operable. Instruction is scheduled to be complete by June 27, 1997.
- Test procedures for other TS Air Filtration Systems will be revised to incorporate appropriate wording to note that when declaring the system inoperable for the conditions listed in the TS, testing identified in the TS shall be performed. Procedure revisions will be complete by June 27, 1997.

**ANALYSIS OF EVENT**

The condition is being reported under 10 CFR 50.73 (a)(2)(i)(B). The licensee shall report any operation or condition prohibited by the plant's Technical Specifications.

**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 97	SEQUENTIAL NUMBER -- 004 --	REVISION NUMBER 00
				5 OF 5

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

The condition is being reported because the FSB EVS was declared operable without performing all the conditions of TS 4.5.A.6.c, and the cask crane was moved over the spent fuel pit when the FSB EVS was inoperable contrary to TS 3.8.C.6. TS 3.8.C.6 requires the FSB EVS to be operable whenever irradiated fuel is being handled within the FSB.

The FSB EVS may be inoperable when irradiated fuel is in the FSB, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are being moved over the spent fuel pit during the period of inoperability. TS 4.5.A.6.c requires four conditions to be demonstrated before the FSB EVS can be considered operable; prior to handling of irradiated fuel, or at any time fire, chemical releases or work done on the filters could alter their integrity, or after every 720 hours of charcoal adsorber use since the last test. Operations discovered on April 25, 1997, that as a result of the chemical fume event on April 17, 1997, only the charcoal adsorbers were tested and the FSB EVS returned to operable on April 19, 1997, without performing the two remaining tests of TS 4.5.A.6.c (DOP test of the HEPA filters, and a visual inspection) demonstrating FSB EVS operability. Further assessment determined that on April 25, 1997, the cask crane was moved over the spent fuel pit when the FSB EVS was inoperable contrary to TS 3.8.C.6.

A review of Licensee Event Reports (LERs) over the last two years for similar events concerning failures to perform Technical Specification testing identified LER 95-017.

**SAFETY SIGNIFICANCE**

This event did not have a significant effect on the health and safety of the public. There was no actual safety significance because there was no fuel handling accident (FHA). The Technical Specification is worded to require testing of the filter system which includes DOP testing of the HEPAs to demonstrate their efficiency to filter particulates, but there is no engineering basis for testing the efficiency of particulate filters for chemical fumes. There was no potential safety significance for design basis conditions because the satisfactory performance of testing for Technical Specification 4.5.A.6.c demonstrated that the fuel storage building ventilation system was operable and would have performed its safety function. This event was a compliance issue and not a concern with the ability of the systems to actually perform their design and/or safety function.