

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914-736-8001



Robert J. Barrett
Site Executive Officer

September 19, 1997
IPN-97-128

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
Cancellation of Licensee Event Report # 96-010-00

Reference: NYPA Letter (IPN-96-073), R. J. Barrett to NRC dated July 12, 1996;
LER # 96-010-00, "Weld Channel and Containment Penetration
Pressurization System in a Condition Prohibited by Technical
Specifications Due to a Failed Nitrogen Supply Pressure Regulating
Valve."

Dear Sir:

Licensee Event Report (LER) 96-010-00 was submitted by the referenced letter pursuant to 10 CFR 50.73 (a)(2)(i)(B). Further assessment by the New York Power Authority (NYPA) has determined that this event is not reportable and therefore a Licensee Event Report was not required.

LER 96-010-00 reported two out of four Weld Channel and Containment Penetration Pressurization System (WCCPPS) zones were inoperable. Two or more WCCPPS zones inoperable above cold shutdown is a condition prohibited by the Indian Point 3 Technical Specifications. WCCPPS zone 2 was declared inoperable for testing, and during that time WCCPPS zone 3 was declared to be inoperable as a result of a failed supply regulator for the nitrogen supply system. The nitrogen supply system provides pressurized gas to the WCCPPS if air pressure is low. During normal operation pressurized gas for the WCCPPS is supplied by the Instrument Air System. Technical Specification 3.3.D.1 requires all four (4) zones to be pressurized above 43 psig and the uncorrected air consumption rate to be less than or equal to 0.2% of the containment volume per day when the plant is above cold shutdown. Technical Specification 3.3.D.2 allows one (1) of the WCCPPS zones to be inoperable or the uncorrected air consumption rate to be in excess of 0.2% of the containment volume per day for seven days. Technical Specification 3.3 Bases defines WCCPPS inoperability as not maintaining WCCPPS pressure above 43 psig or the uncorrected air consumption rate is greater than 0.2% of the containment volume per day.

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During the time of this event the conditions required by Technical Specification 3.3.D were being met. This scenario leads NYPA to the conclusion that the WCCPPS zones become inoperable under Technical Specification 3.3.D only if the performance criteria of Technical Specification 3.3.D.1 are not met. This conclusion is consistent with the application of proposed changes and the NRC's evaluation for Amendment 94. These changes were intended to clarify the technical specification for WCCPPS which included deletion of reference to the nitrogen system. Therefore, zone 3 did not have to be declared inoperable and a condition prohibited by the Technical Specifications did not exist. Attachment 1 provides the bases for the cancellation of LER 96-10-00. Attachment II contains the commitments made by the Authority in this letter.

If you have any questions regarding this matter, please contact Mr. Ken Peters at (914) 736-8029.

Very truly yours,



For: Robert J. Barrett

Site Executive Officer
Indian Point 3 Nuclear Power Plant

Attachment

cc: Hubert J. Miller
Regional Administrator
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U. S. Nuclear Regulatory Commission
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King of Prussia, Pennsylvania 19406-1415

INPO Record Center
700 Galleria Parkway
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NRC Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, N.Y. 10511

BASES FOR CANCELLATION OF LER 96-010-00

As discussed in LER 96-010-00 (referenced letter), the Weld Channel and Containment Penetration Pressurization System (WCCPPS) was incorporated into the plant design as an Engineered Safety Feature (ESF) to provide pressurized gas to containment penetrations and most liner inner weld seams such that in the event of a LOCA, there would be no leakage through these potential leakage paths from the containment. The spaces between selected isolation valves are also served by the WCCPPS. The WCCPPS is provided with a regulated supply of compressed air from the Instrument Air System (primary source). A standby source of gas pressure for the system is provided by a bank of nitrogen cylinders. In the event of low air pressure in a WCCPPS header, the WCCPPS requirements will be automatically maintained by the nitrogen supply.

The containment penetrations and liner weld channels are grouped into four independent zones. Each zone is served by its own air receiver, but in the event that air supplies are lost and the receivers become exhausted, nitrogen from a bank of three pressurized cylinders will supply gas to the affected zones. As discussed in FSAR Section 6.6 the standby gas supply (i.e., nitrogen) is sized such that over the 24 hour period following a LOCA, the WCCPPS pressure starts above the peak containment pressure, and then is continually maintained above the post-LOCA containment pressure profile. Based on the FSAR description, operations believed that the failed nitrogen supply regulator resulted in an inoperable zone. Because another WCCPPS zone was also inoperable at that time, a condition was believed to exist that was prohibited by Technical Specification 3.3.D and the event reportable in accordance with 10 CFR 50.73(a)(2)(i)(B).

The Indian Point 3 Technical Specification 3.3.D, Weld Channel and Penetration Pressurization System, contains the requirement that the reactor shall not be brought above the cold shutdown condition unless:

- 3.3.D.1.a. All required portions of the four WCCPPS zones are pressurized above 43 psig.
- 3.3.D.1.b. The uncorrected air consumption for the WCCPPS is less than or equal to 0.2% of the containment volume per day.

Technical Specification 3.3.D.2 allows the requirements of Technical Specification 3.3.D.1 to be modified as follows: 3.3.D.2.a. "Any one of the four WCCPPS zones may be inoperable for a period not to exceed seven consecutive days. 3.3.D.2.b. "The uncorrected air consumption for the WCCPPS may not be in excess of 0.2% of the containment volume per day except for a period not to exceed seven consecutive days. If at any time it is determined that this limit is exceeded, repairs shall be initiated immediately."

BASES FOR CANCELLATION OF LER 96-010-00

The Technical Specification Bases for 3.3 states that a section of Weld Channel Pressurization System piping is considered to be *inoperable* if it brings the air consumption of the WCCPPS above the required 0.2% of the containment volume per day, or if the section can not maintain a pressure above the required 43 psig. The Technical Specification Bases further states that a WCCPPS zone is considered that portion of piping downstream of the air receiver discharge check valve up to the last component pressurized by that system portion.

The Technical Specification Bases is specific on what makes a WCCPPS inoperable and that condition did not exist at the time the event was identified. The pressure for three of the four zones was above the Technical Specification required 43 psig and air consumption was below the required 0.2% of the containment volume per day. Zone 3 of the WCCPPS met the Technical Specification requirements, and therefore, declaring that zone 3 did not meet Technical Specification 3.3.D.1 due to a failed nitrogen supply regulator was not required and only one zone was inoperable under the criteria of Technical Specification 3.3.D.1. One WCCPPS zone inoperable is not a condition prohibited by Technical Specification 3.3.D and an LER was not required. Technical Specification 3.3 Bases further states that no credit was taken for operation of the WCCPPS in the calculation of off-site accident doses and that no other safeguards systems are dependent on operation of the WCCPPS.

The design function of the WCCPPS to include the nitrogen supply system is described in the FSAR. FSAR Section 1.3 and 6.6 describes how the nitrogen supply system supports the WCCPPS design function of continually maintaining the WCCPPS zones gas pressure above the post-LOCA containment pressure profile for 24 hours.

Recognizing the nitrogen supply allows a 24 hour gas supply as a design feature described in the FSAR, the nitrogen supply system is maintained under the work control system similar to other non-Technical Specification design functions. Entering an LCO is not required when the nitrogen standby supply is not available and may cause unnecessary plant shutdown. Therefore, administrative controls will be revised to provide guidance on the nitrogen supply system.

Number	Commitment	Due
IPN-97-128-01	Revise administrative controls to provide guidance to advise that when the nitrogen supply system is unavailable no entry into an LCO is required.	October 24, 1997