

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 4
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TITLE (4) Two Boric Acid Flow Paths Out-of-Service Without an Allowed Outage Time;
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
10	22	97	97	-- 027 --	00	11	21	97	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
POWER LEVEL (10) 100	20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)	
	20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)	
	20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vii)			OTHER	
	20.405(a)(1)(iii)			✓ 50.73(a)(2)(i)			50.73(a)(2)(viii)(A)			(Specify in Abstract below and in Text, NRC Form 366A)	
	20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)				
20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(x)					

LICENSEE CONTACT FOR THIS LER (12)

NAME Kevin Kingsley, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (914) 734-6034
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
X	CB	V	I207	N					

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (if yes, complete EXPECTED SUBMISSION DATE).	X	NO						

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

On October 21, 1997, at approximately 1510 hours, with the plant operating at 100% power, a body-to-bonnet leak of approximately one-quarter to one-half gallon per minute was observed in a Boric Acid Filter Bypass stop valve. A catch containment was established and the leakage was monitored while corrective maintenance options were evaluated. On October 22, at approximately 1300 hours, various valves were closed and both boric acid transfer pumps (BATP) were isolated to establish the isolation boundary for the valve repair. The isolation rendered both BATPs and both boric acid flow paths inoperable, which are conditions prohibited by Indian Point 3 Technical Specifications 3.2.B.2 and 3.2.B.4. Since there was no allowed outage time specified, the Indian Point 3 equivalent of Standard Technical Specification 3.0.3 was applied, which is a reportable condition as stated in NUREG 1022. Repairs were completed and the BATPs and associated flow paths were returned to service at approximately 1500 hours on October 22, eliminating the need for a plant shutdown.

The cause of the event was that the action statements in Technical Specification Section 3.2.C do not provide Allowed Outage Times for each corresponding Limiting Condition for Operation in Section 3.2.B. The Authority will submit an Application for Amendment to propose improvements to this section of the Technical Specifications. There was no significant effect on the health and safety of the public because the repair duration was short (approximately 2 hours) and the Refueling Water Storage Tank remained available as an alternate source of boric acid solution during this period.

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TEXT CONTINUATION

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

Note: Energy Industry Identification System Codes are identified by brackets, { }.

DESCRIPTION OF EVENT

On October 21, 1997, at approximately 1510 hours, with the plant operating at 100% power, a valve in the Chemical and Volume Control System (CVCS) {CB} was observed to be leaking through the valve bonnet, at an estimated rate of one-quarter to one-half gallon per minute (gpm). A catch containment was established and the leakage was monitored while corrective maintenance options were evaluated. On October 22, 1997, at approximately 0800 hours, the leakage was observed to be between four and five gpm. The valve (CH-267B) is the Boric Acid Filter Bypass stop valve {V} associated with the 32 Boric Acid Transfer Pump (BATP) {P}. This is a normally closed manual valve which can be opened to bypass the Boric Acid Filter {FLT} when filter replacement is needed. The system configuration required to accomplish the valve repair isolated both Boric Acid Transfer Pumps. Technical Specification (TS) 3.2.B.2 requires two boric acid transfer pumps to be operable. TS 3.2.B.4 requires one flow path from the boric acid storage system and one flow path from the Refueling Water Storage Tank (RWST) {TK} to the Reactor Coolant System {AB}. TS 3.2.C.2 provides for one BATP being inoperable for up to 48 hours, but does not explicitly address a condition in which both BATPs are inoperable. TS 3.2.C.3 allows the Boric Acid Storage System to be inoperable for up to 48 hours, provided that the RWST is operable. The isolation boundary established for valve repair rendered both BATPs and both boric acid flow paths inoperable, which are conditions prohibited by TS 3.2.B.2 and 3.2.B.4.

On October 22, 1997, at approximately 1300 hours, a protective tagging order (PTO) was prepared to allow both 31 and 32 BATPs be isolated from service to isolate the valve for repairs. TS Section 3, which is equivalent to Standard Technical Specification (STS) 3.0.3, was applied because TS 3.2.C has no Allowed Outage Time (AOT) for both BATPs and their associated flow paths. Application of TS Section 3 through plant procedure AP 21-9, "Implementing Limiting Conditions for Operation," resulted in establishing a 7-hour time limit in which to place the plant in the hot shutdown condition. Repairs were completed and the BATPs and associated flow paths were returned to service at approximately 1500 hours on October 22, 1997, eliminating the need for a plant shutdown.

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CAUSE OF EVENT

The cause of the event was that the action statements in TS Section 3.2.C do not provide AOTs for each Limiting Condition for Operation in TS Section 3.2.B. The Action Statements in TS Section 3.2.C provide an AOT for any one component in the flow path of the boric acid system, but do not address multiple inoperable components or flow paths. A weakness in the Preventive Maintenance (PM) Program for diaphragm valve maintenance contributed to the initiation of this event, the leakage from valve CH-267B.

CORRECTIVE ACTIONS

- The Authority will submit to the NRC, by February 18, 1998, an application for amendment to address identified weaknesses in Technical Specification Section 3.2.
- A review will be conducted, by March 20, 1998, to identify other important diaphragm valves to be included in the PM Program, and to establish the PM schedule for those valves.
- The Authority has recognized the need to make overall improvements to the current Technical Specifications, and has initiated a project to convert to the Improved Standard Technical Specifications at Indian Point 3. The current schedule for this project, as reflected in IPN-97-076, dated June 16, 1997, is to submit the license amendment request during the fourth quarter of 1998. In the meantime, the Authority will continue to submit individual amendment requests for situations that need more immediate attention.

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ANALYSIS OF EVENT

This report is being submitted in accordance with 10 CFR 50.73 (a)(2)(i)(B) for a condition prohibited by the plant's Technical Specifications. The Indian Point 3 Technical Specifications do not provide an action statement for two BATPs and associated flow paths being out-of-service. The Authority applied TS Section 3 when both BATPs were isolated and declared inoperable to support repairs to a leaking CVCS valve. This report is being made because the guidance of NUREG 1022 states that entry into Standard Technical Specification 3.0.3 or its equivalent for any reason is reportable.

A review of LERs submitted during the past two years identified LER 97-021, dated October 6, 1997, as a similar situation. LER 97-021 involved one train of engineered safeguards logic being taken out of service to support a corrective maintenance activity.

SAFETY SIGNIFICANCE

One design feature of the CVCS is to provide an emergency boration capability, so that a second independent means of shutting down the reactor is available in the event that the control rods are unusable. This emergency boration capability is initiated manually by the control room operator, and can be satisfied by one BATP delivering the contents of one Boric Acid Storage Tank {TK} to the suction of the charging pumps. In the unlikely event that the need for emergency boration developed during the short time period (2 hours) taken to perform the valve repair, the RWST remained available as a source of borated water. The basis for Technical Specification Section 3.2 states that the quantity of boric acid in storage from either the boric acid storage system or the refueling water storage tank is sufficient to borate the reactor coolant in order to reach cold shutdown at any time during core life. Therefore, there was no effect on the health and safety of the public as a result of the described condition.