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Lawrence Coyle  
Site Vice President

September 3, 2015

NL-15-118

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11545 Rockville Pike  
Rockville, MD 20852

SUBJECT: Post Accident Monitoring (PAM) Report for an Inoperable Reactor Vessel Level  
Indication System (RVLIS) Train B  
Indian Point Unit Number 3  
Docket No. 50-286  
License No. DPR-64

Dear Sir or Madam:

The purpose of this letter is to submit a report pursuant to Technical Specification (TS) 5.6.7 (Post Accident Monitoring Report) for one channel of Reactor Vessel Level Indication System (RVLIS) Train B inoperable for greater than the TS allowed completion time. TS 3.3.3 [Post Accident Monitoring (PAM) Instrumentation], Table 3.3.3-1, for Function 5, RVLIS requires two operable channels. RVLIS is a Type B, Category 1 function that is provided for verification and long term surveillance of core cooling. RVLIS provides a direct measurement of the collapsed liquid level from the bottom to the top of the reactor vessel and under different coolant flow conditions with and without reactor coolant pumps operating. RVLIS automatically compensates for variations in fluid temperature and density in both Reactor Coolant System (RCS) and instrument capillary tubes. The collapsed level represents the amount of liquid mass that is in the reactor vessel above the core. Measurement of the collapsed water level is selected because it is a direct indication of the water inventory. RVLIS is also used as an Emergency Plan Emergency Action Level (EAL) indicator. The TS Limiting condition for operation (LCO) is satisfied by the operability of two channels of RVLIS (RVLIS-A and RVLIS-B). RVLIS-Train A and Train B includes both a wide range and a narrow range transmitter.

On July 22, 2015, at 12:30 hours, entered TS 3.3.3 Condition A for performance of 3PC-R62C [Inadequate Core Cooling Monitor-86 (ICCM-86) Calibration Test (Train B)] test. Test was unsatisfactory due to RVLIS Train B inoperable. At approximately 15:15 hours, operations remained in TS 3.3.3 Condition A for one or more functions of Table 3.3.3-1 with one or more required channels inoperable for an inoperable Function 5. Required Action A.1 is to restore required channel to operable in 30 days. 3-TS-15-4757 was initiated to track AOT.

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NRC

On August 21, 2015, CR-IP3-2015-04415 recorded that the inoperable RVLIS Train B associated with Limiting Condition for Operation (LCO) 3.3.3 exceeded the requirement to be returned to operable within 30 days as of 12:30 hours. TS 3.3.3 Condition B (Required Action and associated Completion Time of Condition A not met) required action B.1 is to initiate action in accordance with TS 5.6.7. TS 5.6.7 requires a report be submitted to NRC within the next 14 days. The report is to outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrument to operable status.

- Alternate method of monitoring

While RVLIS Train B is inoperable, RVLIS Train A is operable thereby providing the capability to perform the function. Two operable channels ensure no single failure prevents operators from getting the information necessary for them to determine the safety status of the unit following an accident. The level instrument for RVLIS are passive in nature in that no critical automatic action is assumed to occur and there is a low probability of an event requiring this PAM instrumentation during the interval with one inoperable channel.

- Cause

The apparent cause of the inoperability of RVLIS Train B was questionable calibration tolerances and the inability to retrieve calibration data using a laptop computer. The recently revised procedure (3-PC-R62C) was performed for the first time using a laptop computer to gather data. The use of the laptop was required as the normal digital display was non-functional and the long lead time parts were not available from the vendor. During the performance of the procedure, some calibration tolerances were in question and some calibration data could not be retrieved using the laptop computer.

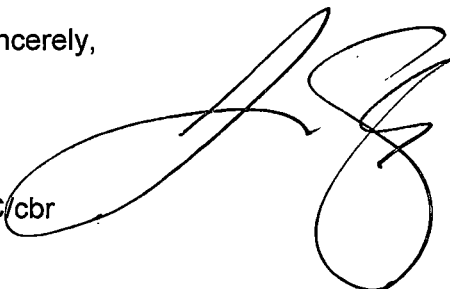
- Plans and Schedule for Restoring Instrument to Operable

RVLIS Train B was declared operable on September 1, 2015. Engineering evaluated the out of tolerance data and issued an engineering change (EC59649) for clarification on acceptance of the data. Engineering determined that the data that could not be retrieved using the laptop computer is not required for Operability. Procedure 3-PC-R62C has been revised to remove the data points that could not be retrieved with the laptop computer from the Equipment Operability and Acceptance Criteria Table to the Overall Acceptance Table in the procedure. DRN-15-00969 was initiated for the procedure revision and work order WO#52500316 for the calibration procedure performance was taken to finished.

Should you have any questions regarding this matter, please contact Mr. Robert Walpole, Manager, Regulatory Assurance, Indian Point Energy Center at (914) 254-6710.

Sincerely,

LC/cbr



cc: Mr. Douglas Pickett, Senior Project Manager, NRC NRR  
Mr. Daniel H. Dorman, Regional Administrator, NRC Region I  
NRC Senior Resident Inspectors Office  
Mr. John B. Rhodes, President and CEO, NYSERDA  
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