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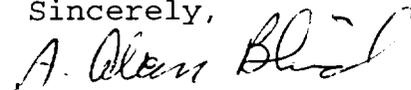
January 8, 2001

Re: Indian Point
Unit No. 2
Docket No. 50-247
LER 2000-008-00
NL-01-01

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop PI-137
Washington, DC 20555-001

The attached Licensee Event Report 2000-008-00 is hereby
submitted in accordance with the requirements of 10 CFR
50.73.

Sincerely,



Attachment

cc: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Patrick D. Milano, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop O-8-C2
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IE22

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), 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. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)

Indian Point, Unit 2

DOCKET NUMBER (2)

05000247

PAGE (3)

1 OF 3

TITLE (4)

Refueling Water Storage Tank Sampling Technical Specification Violation

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIA L NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	07	2000	2000	-008-	00	01	08	2001		05000
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
N	000	20.2201(b)	20.2203(a)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)			
		20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)			
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71			
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER			
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)				
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vi)				Specify in Abstract below or in NRC Form 366A

LICENSEE CONTACT FOR THIS LER (12)

NAME

Richard T. Louie, Senior Engineer

TELEPHONE NUMBER (Include Area Code)

914-734-5678

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURE R	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES
(If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED
SUBMISSION
DATE (15)

MONTH DAY YEAR

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

On December 7, 2000, with the unit at zero percent power, an internal licensee audit identified that between April 10, 2000 and June 1, 2000, the curie content of the Refueling Water Storage Tank (RWST) had not been determined. During this period, the plant was in an extended refueling outage, requiring several large RWST water inventory adjustments. Technical Specification 4.10.A.6 requires that the quantity of radioactivity in the RWST be determined at least once a month when radioactive materials are being added to the tank. Furthermore, Technical Specification 3.9.A.5 requires the quantity of radioactive material in the RWST to be less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. In accordance with established procedures, Chemistry personnel normally obtain a monthly RWST sample and determine boron concentration and gross activity. However, at the time that the sample was to be obtained, the RWST water inventory was below the level at which a representative sample could be obtained. The surveillance was not rescheduled to meet the Technical Specification requirements. During the time the RWST was not sampled, there were no liquid releases from the RWST to the environment. Therefore, there were no adverse safety consequences as a result of this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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Indian Point, Unit 2	05000247	2000	-008-	00	2 OF 3

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

PLANT AND SYSTEM IDENTIFICATION

Westinghouse 4-Loop Pressurized Water Reactor

EVENT IDENTIFICATION

Refueling Water Storage Tank Sampling Technical Specification Violation

EVENT DATE

December 7, 2000

REFERENCES

Condition Reporting System Number: 200010020

PAST SIMILAR EVENTS

LER 1998-018

EVENT DESCRIPTION

On December 7, 2000, with the unit at zero percent power, an internal licensee audit identified that between April 10, 2000 and June 1, 2000, the curie content of the Refueling Water Storage Tank (RWST) had not been determined. During this period, the plant was in an extended refueling outage, requiring several large RWST water inventory adjustments. Technical Specification 4.10.A.6 requires that the quantity of radioactivity in the RWST be determined at least once a month when radioactive materials are being added to the RWST. Furthermore, Technical Specification 3.9.A.5 requires the quantity of radioactive material in the tank to be less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. In accordance with established procedures, Chemistry personnel normally obtain a monthly RWST sample and determine boron concentration and gross activity. However, at the time that the sample was to be obtained, the RWST water inventory was below the level at which a representative sample could be obtained. The cause of this occurrence has been attributed to a failure to fully comply with the requirements of the Chemistry department procedure. Specifically, the procedure requires that immediate notification to supervision be made if a sample cannot be collected from the RWST. Supervision was notified but the surveillance was not rescheduled to meet the Technical Specification requirements. During the time the RWST was not sampled, there were no liquid releases from the RWST to the environment. Therefore, there were no adverse safety consequences as a result of this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

EVENT ANALYSIS

This event is reportable in accordance with 10CFR50.73(a)(2)(i)(B), which requires a report of, "Any operation or condition prohibited by the plant's Technical Specifications." Technical Specification 4.10.A.6 requires that the quantity of radioactivity in the RWST be determined at least once a month when radioactive materials are being added to the RWST. Furthermore, Technical Specification 3.9.A.5 requires that the quantity of radioactive material in the tank to be less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. During the time period from April 10, 2000 to June 1, 2000, the curie content of the RWST was not determined. Since the plant was in an extended outage, requiring removal of the fuel, the RWST went through several large water inventory adjustments, including the transfer of radioactive water into the tank from the spent fuel pool and the refueling cavity.

As part of the Chemistry Surveillance program, sampling of the RWST is scheduled to be performed at least once per month. However, in this instance, the RWST sampling was not performed in time to meet the Technical Specification required surveillance. The tank had been drained below the level at which a representative sample could be obtained during a portion of the time period between April 10 and June 1 and the required surveillance was not completed. Chemistry failed to collect a sample from the RWST during the required surveillance interval, and failed to initiate a Condition Report as required by procedure to identify this condition. After the internal audit identified the missed surveillance, a review was performed of Operator logs relative to filling and draining of the RWST. It was concluded that there was probably sufficient opportunity to have taken the RWST sample as required by the Technical Specifications.

EVENT SAFETY SIGNIFICANCE

The objective of restricting the quantity of radioactive material contained in the specified tanks provides assurance that, in the event of an uncontrolled release of any such tank's contents, the resulting concentration would be less than 10CFR20, Appendix B limits. During the time period that this surveillance (RWST sampling) was missed, there were no liquid releases from the RWST to the environment.

CORRECTIVE ACTIONS

The corrective actions are to 1) establish a formal method of tracking and rescheduling chemistry surveillance tests which could not be performed due to plant conditions and 2) provide additional guidance relative to the appropriate plant data which should be used to determine whether plant conditions permit the performance of a specific surveillance test. These actions will be completed by February 28, 2001.