**A. Alan Blind**
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5718
blinda@coned.com

February 28, 2001

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-01-021

Mr. Hubert J. Miller
Regional Administrator
US Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Special Report – February 14, 2001 Inoperability of the High-Pressure Water Fire Protection System Due to Maintenance Activity (NRC Event Number 37747)

Dear Mr. Miller:

In accordance with Indian Point Unit No. 2 Facility Operating License Condition 2.K and the NRC-approved fire protection program requirements, and in particular, the requirement for submission of reports within 14 days of certain conditions, this letter is for the purpose of reporting the February 14, 2001 inoperability of the high-pressure water fire protection system. This report outlines the responsive actions taken for the inoperability, the cause of the inoperability, and the plans and schedule for restoring the system to operable status.

Requirement 2.a.1 of Addendum I of Station Administrative Order (SAO) 703, "Fire Protection Impairment Criteria and Surveillance," requires that the high-pressure water fire protection system shall have two main motor-driven fire pumps and one diesel-driven fire pump operable and properly aligned to the high-pressure fire header. SAO-703 allows this requirement to be modified to allow any one condition to exist at any one time: either both motor-driven fire pumps or the diesel-driven fire pump can be out of service provided the inoperable equipment is restored to operable status within seven days. With the high-pressure water fire protection system inoperable in a manner other than permitted by Requirement 2.a.1, Required Action 2.b.1 of SAO-703 states that an alternate fire protection system shall be established within 24 hours, that the NRC Region I Office shall be notified by telephone within 24 hours of identification and such notification confirmed by telegraph, mailgram, or facsimile transmission no later than the first working day following the event; and that a special report outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status shall be submitted to the NRC Regional Administrator of the Region I office within 14 days following the event.

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Not in ADAMS as of 03/12/01

To perform maintenance on various valves, it was necessary to temporarily close the valve which normally interconnects the inner and outer loops of the high-pressure water fire protection system. This action isolated the inner loop from the diesel-driven fire pump and isolated the outer loop from the two main motor-driven fire pumps for the duration of the maintenance activity effectively rendering the diesel-driven fire pump out-of-service for the inner loop and the two main motor-driven fire pumps out-of-service for the outer loop. Since both conditions existed at the same time, Requirement 2.a.1 was not satisfied and Required Action 2.b.1 became applicable. Additionally, since work was to be performed on the discharge check valve, the tag-out rendered 12 Fire Main Booster Pump inoperable. As part of the planned activity, the diesel fire pump was placed in service as the alternate fire protection system for the outer loop. The 11 Fire Main Booster Pump remained available as the alternate fire protection system for the inner loop.

The high-pressure water fire protection system tag-out began on February 14, 2001 at approximately 0408 hours. The program requirement for notification by telephone, along with the confirmation of the telephone notification made by facsimile, was satisfied on February 14, 2001 by the shift technical advisor. During the course of initiating the maintenance tagout, system in-leakage prevented adequate system isolation; therefore planned maintenance activities were re-scheduled.

While returning the high-pressure water fire protection system to operable status, a relief valve spuriously opened thereby diverting water through a return line back to the city water system. The relief valve was promptly isolated and the system restored to operable status. Diversion of flow through the relief valve would have caused diminished flow and pressure in certain portions of the system and would have, in itself, caused the high-pressure fire water protection system to be declared degraded with the subsequent initiation of notifications in accordance with SAO-703. The NRC Region I Office had already been notified of the system being considered degraded. This report also serves to document the cause and responsive action taken for the temporary inoperability and the completion of restoration of the system to operable status. The system was returned to operable status at approximately 0337 hours on February 17, 2001.

There are no commitments contained in this correspondence. Should you have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety and Licensing (914)734-5074.

Sincerely,

A Alan Blind

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Mr. Patrick D. Milano, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
U.S. Nuclear Regulatory Commission
Mail Stop O-8-C2
Washington, D.C. 20555

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555