



Indian Point Energy Center  
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June 22, 2006

Re: Indian Point Unit 2  
Docket 50-247

NL-06-070

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Report on Inoperable Post Accident Monitoring Instrument LT-940

Dear Sir:

The purpose of this letter is to submit a report pursuant to Technical Specification (TS) 5.6.6. Condition B of TS 3.3.3 requires submittal of a report within 14 days of exceeding the allowed outage time of Condition A of TS 3.3.3 for specified Post Accident Monitoring (PAM) instruments. Pursuant to TS 5.6.6, the report is to outline the alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrument to operable status.

PAM instrument LT-940 is required to be operable in Modes 1, 2, and 3 by TS 3.3.3, Table 3.3.3-1, Function 6 "Containment Water Level (Containment Sump)." The LCO for this function is satisfied by the operability of three instrument channels, LT-940, LT-941 and LT-3300. During the recent refuel outage for Indian Point 2 a determination was made that LT-940 was not environmentally qualified. Condition A of TS 3.3.3 was entered on May 16, 2006 when IP2 entered Mode 3 from refuel outage 17. Action A.1 to restore the channel to operable status was not completed within 30 days (i.e., June 15, 2006), therefore Condition B was entered. Condition B required immediate action in accordance with TS 5.6.6 to submit a report within 14 days as described above.

The LT-940 is considered inoperable since it is not qualified for the post accident environment. The alternate method of monitoring is LT-941 and LT-3300 in the Containment Sump and LT-939 and LT-3301 in the Recirculation Sump. LT-939 and LT-941 illuminate a series of five lights in the Control Room as preset limits are exceeded. LT-3300 and LT-3301 are differential pressure transmitters that provide a continuously indicated level. LT-939 and LT-3300 are powered from one safeguards train and LT-941 and LT-3301 are powered from a separate train. The corrective action for LT-940 is to prepare a change to the TS to revise the requirements for


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level transmitters so that LT-940 is no longer required by the TS. This planned TS change is supported by a determination that LT-940 is not required to meet the intent of the PAM requirements, including appropriate consideration of single failure. As such, it is not planned to upgrade LT-940 to meet environmental qualification requirements. The planned TS change will be made consistent with the requirements of the Standard Technical Specifications for level transmitters.

There are no new commitments being made in this submittal.

If you have any questions or require additional information, please contact Mr. Patric W. Conroy, Licensing Manager, at 914-734-6668.

Sincerely,

  
Mr. Patric W. Conroy  
Licensing Manager  
Indian Point Energy Center

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR  
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1  
NRC Resident Inspector, IP2  
Mr. Paul Eddy, New York State Dept. of Public Service