



Entergy Nuclear Northeast
Indian Point Energy Center
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Fred Dacimo
Site Vice President
Administration

September 22, 2006

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-06-093

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Stop O-P1-17
Washington, DC 20555-0001

Subject: Licensee Event Report 2006-002-00, "Technical Specification Prohibited Condition for Two Inoperable Channels of PAM Instrumentation".

Dear Sir or Madam:

The attached Licensee Event Report (LER) 2006-002-00 is submitted in accordance with 10 CFR 50.73. The enclosed LER identifies an event where the plant was operated in a condition prohibited by Technical Specifications, which is reportable under 10 CFR 50.73(a)(2)(i)(B). This condition has been recorded in the Entergy corrective action program as Condition Report CR-IP2-2006-04402.

There are no new commitments identified in this letter. Should you or your staff have any questions regarding this submittal, please contact Mr. Patric W. Conroy, Manager, Licensing, at (914) 734-6668.

Very truly yours,

A handwritten signature in black ink, appearing to be "Fred R. Dacimo".

Fred R. Dacimo
Site Vice President
Indian Point Energy Center

cc: next page

IE22

Attachment: LER-2006-002-00

cc:

Mr. Samuel J. Collins, Regional Administrator, Region I
IPEC NRC Resident Inspector's Office, Indian Point Unit 2
Mr. Paul Eddy, New York State Department of Public Service
INPO Record Center

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

| | | |
|---|--------------------------------------|--------------------------|
| 1. FACILITY NAME: INDIAN POINT 2 | 2. DOCKET NUMBER 05000-247 | 3. PAGE 1 OF 4 |
|---|--------------------------------------|--------------------------|

4. TITLE: Technical Specification Prohibited Condition for Two Inoperable Channels of PAM Instrumentation

| 5. EVENT DATE | | | 6. LER NUMBER | | | 7. REPORT DATE | | | 8. OTHER FACILITIES INVOLVED | |
|---------------|-----|------|---------------|-------------------|----------|----------------|-----|------|------------------------------|---------------|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REV. NO. | MONTH | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 7 | 24 | 2006 | 2006 | 002 | 00 | 9 | 22 | 2006 | FACILITY NAME | DOCKET NUMBER |
| | | | | | | | | | | 05000 |
| | | | | | | | | | | 05000 |

| | | | | | | | | | | |
|--|--|---|---|---|--|--|--|--|--|--|
| 9. OPERATING MODE 1 | 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) | | | | | | | | | |
| 10. POWER LEVEL 100% | <input type="checkbox"/> 20.2201(b) | <input type="checkbox"/> 20.2203(a)(3)(i) | <input type="checkbox"/> 50.73(a)(2)(i)(C) | <input type="checkbox"/> 50.73(a)(2)(vii) | | | | | | |
| | <input type="checkbox"/> 20.2201(d) | <input type="checkbox"/> 20.2203(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(1) | <input type="checkbox"/> 20.2203(a)(4) | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(i) | <input type="checkbox"/> 50.36(c)(1)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix)(A) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(ii) | <input type="checkbox"/> 50.36(c)(1)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(v)(A) | <input type="checkbox"/> 73.71(a)(4) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(iv) | <input type="checkbox"/> 50.46(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(v)(B) | <input type="checkbox"/> 73.71(a)(5) | | | | | | |
| <input type="checkbox"/> 20.2203(a)(2)(v) | <input type="checkbox"/> 50.73(a)(2)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(v)(C) | <input type="checkbox"/> OTHER | | | | | | | |
| <input type="checkbox"/> 20.2203(a)(2)(vi) | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(v)(D) | Specify in Abstract below or in NRC Form 366A | | | | | | | |

12. LICENSEE CONTACT FOR THIS LER

| | |
|---|---|
| NAME Bryan Ray, Instrumentation and Control Maintenance | TELEPHONE NUMBER (Include Area Code) (914) 736-8704 |
|---|---|

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

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|--------------|--------------------|-------|--------|-----------|--------------|--------------------|
| X | IP | LT | B080 | Y | | | | | |

| | | | | |
|--|-------------------------------------|-------|-----|------|
| 14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO | 15. EXPECTED SUBMISSION DATE | MONTH | DAY | YEAR |
| | | | | |

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

On July 24, 2006, Post Accident Monitoring (PAM) instrument LT-3300 was determined to be inoperable. This determination was made when reviewing data taken during a July 22, 2006 containment pressure relief. The containment level transmitter LT-3300, which indicates sump water level, unexpectedly responded to changes in containment pressure. It was subsequently determined that LT-3300 had been inoperable since May, 16, 2006, the date Unit 2 exceeded Mode 3 upon startup from the 2R17 refuel outage.

The instrument, LT 3300, was one of three containment water level (containment sump) instruments required to be operable in accordance with Technical Specification (TS) 3.3.3. One other required PAM instrument, LT-940, had previously been declared inoperable since May 16, 2006. Therefore, two required channels had been inoperable since May, 16, 2006. This time period exceeded the TS 3.3.3, Condition C, 7 day completion time. In addition, entry into Mode 3 on May 16, 2006, and subsequent return to full power, was made with these two channels inoperable without meeting the requirements of LCO 3.0.4. The apparent cause of the failure of LT-3300 is indeterminate at this time due to instrument inaccessibility during plant operation. Corrective actions are to include troubleshooting and replacement or repair of LT-3300 during 2R18 refuel outage. The cause of LT-3300 inoperability will be further evaluated at that time.

This event had no effect on public health and safety.

LICENSEE EVENT REPORT (LER)

| 1. FACILITY NAME | 2. DOCKET | 6. LER NUMBER | | | 3. PAGE |
|---------------------|-----------|---------------|-------------------|-----------------|---------|
| Indian Point Unit 2 | 05000-247 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 2 OF 4 |
| | | 2006 | 002 | 00 | |

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

DESCRIPTION OF EVENT:

Note: The Energy Industry Identification System Codes are identified within brackets { }

On July 24, 2006, PAM instrument LT-3300 {IP} was determined to be inoperable. This determination was made when reviewing data taken during a July 22, 2006 containment pressure relief that reduced containment pressure from 0.6 psig to -0.1 psig. The containment level transmitter LT-3300, which indicates sump water level, unexpectedly responded to changes in containment pressure. As containment pressure lowered there was an increase in indicated sump level from 40.8 feet to 41.3 feet. This event was recorded in the IPEC corrective action program as CR-IP2-2006-04402. It was subsequently determined that LT-3300 had been inoperable since May, 16, 2006, the date Unit 2 exceeded Mode 3 upon startup from the 2R17 refuel outage.

The instrument, LT 3300, was one of three containment water level (containment sump) instruments required to be operable in accordance with TS 3.3.3. The other two required PAM instruments were LT-940 and LT-941. However, LT-940 had previously been declared inoperable upon exceeding Mode 3 during startup from refuel outage 2R17 on May 16, 2006. Therefore, two required channels had been inoperable since May, 16, 2006. This time period exceeded the TS 3.3.3 Post Accident Monitoring Instrumentation, Condition C, 7 day completion time to restore all but one channel to operable status. In addition, entry into Mode 3 on May 16, 2006, and subsequent return to full power, was made with these two channels inoperable without meeting the requirements of LCO 3.0.4. Therefore, a reportable condition was determined to exist pursuant to 50.73(a)(2)(i)(B).

An evaluation was conducted and the following sequence of events that occurred during and following refueling outage 2R17 was identified:

- During the 2R17 outage (April/May, 2006), as part of a containment building sump upgrade, LT-3300 was removed and reinstalled. LT-3300 consists of a Barton {B080} Model 764 differential pressure electronic transmitter {LT}, high and low pressure taps, a test connection line with isolation valve and test connection, and a remote operated isolation valve. The transmitter and instrument tubing were removed and re-installed as a unit. The high and low pressure taps attached to the transmitter are sealed. The test line and remote isolation line were disassembled and reassembled in the upgraded sump and pressure tested satisfactorily.
- During the 2R17 outage repairs were made to the LT-3300 installation to resolve tubing air leaks. The repairs were determined to be successful by leak test and proper slope, proper support and absence of kinks.
- On May 13, 2006 LT-3300 was satisfactorily calibrated.

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

- A review of previous IPEC condition reports written against LT-3300 identified a condition, identified in 1999, where indicated level was dependent on containment pressure. The corrective action was to vent the instrument lines, which was completed during the 2R13 refueling outage.
- A review of previous industry condition reports written against Barton Model 764 transmitters did not identify any additional relevant information.
- A review of LT-3300 transmitter data showed that the instrument had been responding to containment pressure changes as early as May 18, 2006.
- An extent of condition review was conducted. Only one other Barton 764 transmitter is in service. It is a recirculation sump level transmitter and shows no signs of influence of containment pressure.

LT-3300 is located inside the crane wall in an elevated radiological field and heat stress area. Therefore, troubleshooting and repair of LT-3300 cannot reasonably be performed during plant operation. These activities were deferred until 2R18 refuel outage that would allow access to conduct the troubleshooting, repair or replacement activities.

On August 23, 2006 during a forced outage, a visual inspection of LT-3300 was conducted. There was no visible damage or kinks to the capillary tubing or other obvious indications.

CAUSE OF EVENT

The apparent cause of the failure of LT-3300 is currently indeterminate as LT-3300 is not accessible during higher modes of operation.

CORRECTIVE ACTIONS

The following corrective actions have been or will be performed under the Corrective Action Program (CAP) to address the causes of this event and prevent recurrence:

- The troubleshooting and replacement or repair of LT-3300 has been scoped as 2R18 outage work.
- The cause of LT-3300 inoperability will be evaluated following troubleshooting and replacement or repair of LT-3300.

LICENSEE EVENT REPORT (LER)

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

EVENT ANALYSIS

The event is reportable under 10CFR50.73(a)(2)(i)(B). The licensee shall report any event or condition which was prohibited by the plant TS. This event meets the reporting criteria because two containment water level (containment sump) instruments required to be operable in accordance with TS 3.3.3 were determined to be inoperable for greater than the TS allowed completion time of 7 days. The requirements of TS 3.3.3, Condition C, were not met from May 16, 2006, until LT-940 was removed from the TS on July 28, 2006 via an emergency TS amendment (TS Amendment No. 249). The amended TS allow for continued operation with one of two channels inoperable. In addition, entry into Mode 3 on May 16, 2006, and subsequent return to full power, was made with these two channels inoperable without meeting the requirements of LCO 3.0.4.

PAST SIMILAR EVENTS

A review of the past two years of Licensee Event Reports (LERs) was performed for events that involved inoperable components that exceeded the TS allowed completion time and identified two issues when AOTs were exceeded. LER 2005-001 described an event where an auxiliary component cooling water pump was determined to be inoperable due to an improperly serviced discharge check valve. LER 2005-002 described an event where one train of ECCS was inoperable due to gas intrusion from a leaking check valve.

SAFETY SIGNIFICANCE

This event had no effect on the health and safety of the public. There were no actual safety consequences for the event because there were no accidents or transients requiring the use of these instruments.

There were no significant potential safety consequences of this event under reasonable and credible alternative conditions. The TS in force at the time of the event specified three required channels (LT-940, LT-941 and LT-3300) for the containment sump water level instrumentation. Subsequent to the event a TS amendment was approved that specifies two required channels (LT-941 and LT-3300). The amended TS allows for continued operation with one of these two channels inoperable provided a report is submitted to the NRC pursuant to TS 5.6.6. This report was provided on August 7, 2006 (NL-06-083). The amended TS represents a safe operating condition and mirrors the configuration of the plant covered by this event report (LT-941 operable, LT-3300 inoperable). Therefore, the plant was in a safe operating condition during the event.