Entergy

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March 18, 2008

Re: Indian Point Unit No. 3
Docket No. 50-286

NL-08-055

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

SUBJECT: **Report on Inoperable Post Accident Monitoring Instrumentation for Position Indication for Containment Isolation Valves CA-PCV-1229 and CA-PCV-1230**

Dear Sir or Madam:

In accordance with Technical Specification (TS) 3.3.3 Required Action F.1, a report is required to be submitted in accordance with TS 5.6.7 within 14 days of exceeding the TS allowed Completion Time of TS 3.3.3 Condition C for specified Post Accident Monitoring (PAM) Instrumentation. Pursuant to TS 5.6.7, the report is to outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the function to operable status. Accordingly, Entergy Nuclear Operations, Inc. (Entergy) hereby submits the required report for the position indication for containment isolation valves CA-PCV-1229 and CA-PCV-1230 (condenser air ejector return to containment), which was determined to be inoperable on February 29, 2008.

TS Limiting Condition for Operation(LCO) 3.3.3 requires that the PAM instrumentation for automatic containment isolation valve position, listed in TS Table 3.3.3-1 as Function 9, be operable in Modes 1, 2, and 3. For containment isolation valves CA-PCV-1229 and CA-PCV-1230, this LCO is satisfied by "Two is True" status lights (one red and one white light) located in the central control room (CCR). When a valve is closed, a lower limit switch on the valve illuminates the red "Two is True" status light (the white status light is lit when power is applied to the circuit). There are also valve position status lights (one red and one green light), which are not credited for the PAM instrumentation function, for each valve located on a separate panel in the CCR. When a valve is closed, an upper limit switch on the valve illuminates the green status light. The same lower limit switch as discussed previously also illuminates the red status light when a valve comes off its closed seat, so both the red and green lights will be illuminated while a valve is stroking open. When a valve is full open, the upper limit switch closes the green light and only the red light is illuminated.

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During a recent surveillance for stroke testing of these valves, the lower limit switches were observed to be sticking such that they remained closed even when the valve was opened. This resulted in a closed indication for the valves, when they were in fact open, as the red "Two is true" status light is illuminated by a closed lower limit switch. As the reliability of these two limit switches could not be assured and the "Two is True" status lights could be falsely indicating the valves are closed when they are actually open, it was decided to declare the credited position indication inoperable. Local observation of the valves during the test confirmed that the valves were closed, therefore, the valves remain operable for the function of providing containment isolation. Since the upper limit switches function properly, the function of diversion of condenser air ejector to containment is also not impacted.

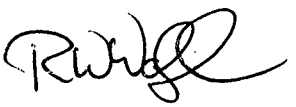
TS Table 3.3.3-1 Function 9 requires 2 operable channels per penetration flow path for Automatic Containment Isolation Valve Position. As the non-working lower limit switches in both channels of position indication caused the "Two is True" position indication to be inoperable, TS Condition C (one or more Functions with two required channels inoperable) was met. The Required Action C.1 to restore one channel to operable status has a Completion Time of 7 days, and was entered on February 29, 2008. One channel was not restored to operable status within 7 days, thus, TS Condition D with Required Action D.1 was entered on March 6, 2008. As specified in Table 3.3.3-1, this requires entry into Condition F, with Required Action F.1 to initiate action in accordance with TS 5.6.7, which requires submittal of this report within the next 14 days. The automatic action to open CA-PCV-1229 and CA-PCV-1230 on the detection of radiation by Radiation Monitor R-15 in the condenser air ejector process stream is not impacted by this condition.

The inoperability of Function 9 for automatic containment isolation valves CA-PCV-1229 and CA-PCV-1230 is due to sticking of the lower limit switches, however, the cause of the sticking is not known at this time. Entergy currently plans to repair or replace the lower limit switches on or about May 5, 2008. In the interim, the alternate method of monitoring the position of the affected containment isolation valves is to use the individual valve position indication green light along with indication of weld channel flow. When the actual affected valve is in the closed position, the green light will be illuminated and the weld channel flow for Zone 4 would be normal. When the affected valve is in the full open position, there will be no individual valve status lights illuminated and weld channel flow for Zone 4 would be elevated.

There are no commitments contained in this letter.

If you have any questions or require additional information, please contact me at 914-734-6710.

Sincerely yours,



R.W. Walpole
Manager, Licensing

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