Stephen B. Bram Vice President

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Consolidated Edison Company of New York, Inc. Indian Point Station Broadway & Bleakley Avenue Buchanan, NY 10511 Telephone (914) 737-8116

July 4, 1991

Re: Indian Point Unit No. 2 Docket No. 50-247 LER 91-09-00

Document Control Desk US Nuclear Regulatory Commission Mail Station P1-137 Washington, DC 20555

The attached Licensee Event Report LER 91-09-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

Very truly yours,

Attachment

cc: Mr. Thomas T. Martin Regional Administrator - Region I US Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

> Mr. Francis J. Williams, Jr., Project Manager Project Directorate I-1 Division of Reactor Projects I/II US Nuclear Regulatory Commission Mail Stop 14B-2 Washington, DC 20555

Senior Resident Inspector US Nuclear Regulatory Commission PO Box 38 Buchanan, NY 10511

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During a planned preventive maintenance procedure for the limit switches associated with the Steam Generator Blowdown (SGBD) Containment isolation valves, it was determined that Conax connectors associated with limit switches were installed incorrectly. At the time of discovery the plant was at cold shutdown for a refueling outage. An evaluation of the Conax connector installation was initiated for those associated with the solenoid operated valves (SOVs) controlling operation of the SGBD isolation valves and subsequently to all installed Conax connectors. All 46 Conax connectors currently in service are located external to containment. Other equipment served by the Conax connectors include the main steam isolation valves (MSIVs) and associated limit switches as well as the recirculation valves/limit switches for the motor driven auxiliary feedwater pumps.

To determine operability of the "as found" configuration, the connectors together with SOVs/limit switches were subjected to functional testing in the "as found condition", with positive results being obtained. Test parameters enveloped the environment which would be seen under postulated accident scenarios. Accordingly, despite the discrepancy in the installed configuration, it was determined that all safety functions would have been fulfilled.

NRC FORM 366A (6-89)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92											
LICENSEE EVENT RE TEXT CONTINUA	PORT (LER) TION	ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BUHDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P.530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.											
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TEXT (If more space is required, use additional NRC Form 366A's) (17)													
PLANT AND SYSTEM IDENTIFICAT	CION:												
Westinghouse 4-Loop Pressuri	zed Water Reactor												
IDENTIFICATION OF OCCURRENCE	3:												
Incorrect installation of Co	onax connectors.												
EVENT DATE:		、											
June 5, 1991	· · ·	м. М											
<b>REPORT DUE DATE:</b>													
July 4, 1991	· ·												
PAST SIMILAR OCCURRENCE:		· · ·											
None													
DESCRIPTION OF OCCURRENCE:													
Background													
Conax electrical conductor s environmentally qualified (E compressing a tapered ferrul the assembly housing. This midlock cap nut, which irrev conductors and their insulat seal.	eal assemblies (ECSA) are Q) connectors. The EQ se e against a similarly bev compression is obtained b ersibly deforms the ferru ing sheaths, thereby crea	e used to provide al is obtained by weled seat within by torquing a alle around the ting a permanent											
Description		· .											
A part of a preplanned prove													

A part of a preplanned preventive maintenance procedure required replacement of limit switches associated with the position of the SGBD containment isolation valves. During the procedure, it was noted that the midlock caps of the ECSAs were not fully tightened and the ferrules were not seated. This condition appeared improper and the Conax installation manual was consulted for guidance. The manufacturer required a torque in the range of 220 to 250 ft-lbs. on the midlock cap to adequately seal the connector.

(6-89)	U.S. NUCLEAR REGULATORY COMM	APPROVED OMB NO. 3150-0104
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DESCRIPTION OF OCCURRENCE: (	(Continued)	
SOVs which control the posit ECSAs were found to have bee midlock cap was attached dir sealbody, thereby having the be environmentally qualified additional anomalies concern ferrules inserted in the wro ferrules such that compressi of 24 ECSAs were associated each of 8 SOVs and one for e	tion of the SGBD isolat en installed in the rev rectly to the device as e EQ seal away from the d. Upon disassembly of hing ferrules were four ong direction and/or mi ion/seal formation woul with the 8 SGBD isolat each of 16 limit switch	tion valves. The verse direction; the s opposed to the e device which is to the ECSAs, several ad. These included splacement of the d not occur. A total tion valves; one for thes.
The remaining 22 ECSAs insta installed external to contai associated with 4 main steam SOVs; and 2 motor driven aux - one for each of two SOVs a Similar to earlier findings, improperly torqued and a num assembly.	alled were inspected. nment. These remaining isolation valves - on ciliary feedwater pump and one for each of 4 1 all the ECSAs were for ober evidenced a revers	All ECSAs were ag ECSAs were the for each of 16 recirculation valves imit switches. bund to have been cal in the ECSA
Technical data was available indicated that these limit s extensive exposure to water. switches and 2 SOVs with ass found" configurations. The - 4 psig, saturated steam su for one hour - enveloped the be subjected to in the accid test, the limit switches and demonstrating operability in	for the NAMCO limit s witches would remain o On this basis four s ociated ECSAs) were te environmental paramete bsequently superheated worst environment tha ent scenario. Through SOVs functioned relia the "as found" config	witches which perable despite amples (2 limit sted in the "as rs and test duration to 264°F and held t the equipment would out the one hour bly thereby uration.
ANALYSIS OF OCCURRENCE:		
Since the SOVs and limit swi environmental testing of the that all safety related equip there was no impact upon the	tches functioned accep "as found" configurat pment was operable in health and safety of	tably during the ion, it is concluded the past. Thus, the public.
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CAUSE OF OCCURRENCE:

As a result of the nonconformances, a review was conducted of the work packages for the original installation in 1982. This documentation contained no installation instructions for Conax ECSAs. An Engineering document did acknowledge acceptance of a reversed Conax coupling for the MSIV SOVs which came about as a result of then existing field conditions. The thread size of the midlock cap (1" male NPT) matched that of the SOV female NPTs. Engineering justification for approval of the field condition was documented.

It is thus concluded that the Conax ECSAs were installed improperly in 1982 as a result of inadequate installation instructions and faulty workmanship.

CORRECTIVE ACTION:

All Conax connectors presently conform to their "Environmental" configuration, thus assuring operability under possible future adverse conditions.

For the past several years, increased emphasis has been placed upon the importance of maintaining environmentally qualified installations. Consequently, it is believed that this is a singular occurrence that would not be repeated in the future. In place programs for extensive training, preventive maintenance and inspections provide reasonable assurance against a repeat occurrence.