

Stephen B. Bram
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340

March 11, 1994

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

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

SUBJECT: March 10, 1994 Isolation of High-Pressure Water
Fire Protection System in the Primary Auxiliary
Building

With reference to Technical Specification 3.13.A.3.b. for Indian Point Unit No. 2, the purpose of this letter is to confirm the telephone notification made to you on March 10, 1994 concerning isolation of the high-pressure water fire protection system and to provide additional information regarding the event.

Technical Specification 3.13.A.1.c requires that the high-pressure water fire protection system shall have all piping and valves necessary for proper functioning of any portion of the system required for protection of safe shutdown systems operable. If this requirement cannot be met, then according to Technical Specification 3.13.A.3 the high-pressure water fire protection system is inoperable in a manner other than permitted, and Technical Specification 3.13.A.3.b requires that an alternate fire protection system shall be established within 24 hours.

On March 10, 1994, to effect planned repairs on the isolation valve for a Technical Specification hose station on elevation 15' in the west end of the primary auxiliary building (PAB), it was necessary to isolate the high-pressure water fire header into the PAB. The work was expected to last approximately 3 hours, well within the 24 hour allowed outage time. An operator was to be stationed at the work location and in page/telephone contact with the control room operators. In the event of a fire in the PAB, this operator would ensure a replacement threaded valve was quickly installed and the header isolation valves reopened to provide water in the header.

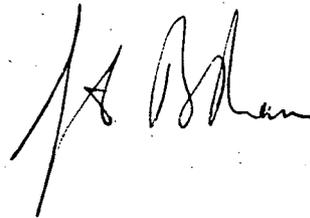
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Valve tagouts were instituted but before the repair was commenced, the job was postponed and the tagouts were cleared. The system had been isolated, but not breached, for approximately 15 minutes. The fire header in the PAB is actuated manually by the fire brigade through operation of a hose station(s). The operator was in page/telephone contact with the control room during the short time the header was isolated, and the high-pressure water fire protection system could have been restored in a timely manner prior to fire brigade use of a hose station(s), if such use had been required.

Should you or your staff have any questions, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing.

Very truly yours,



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

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