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May 2, 1994

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 94-02-00

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

The attached Licensee Event Report LER 94-02-00 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
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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN 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.

FACILITY NAME (1) Indian Point Unit No. 2 DOCKET NUMBER (2) 0 5 0 0 0 2 4 7 1 PAGE (3) OF 0 4

TITLE (4) Entry into Technical Specification 3.0.1. on IVSWS

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)								
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES								
0	4	0	2	9	4	9	4	0	5	0	0	0	0	0	0	0	0

OPERATING MODE (9) N THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
<u>Robert Stonum, Sr. Engineer</u>	<u>9 1 4 7 3 4 - 5 1 2 9</u>

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO X

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On Saturday, April 2, 1994, an entry into Technical Specification 3.0.1 took place. The initiating event was corrected within the one hour allowed for trouble shooting and a plant shutdown was not commenced.

On April 2, 1994, Indian Point 2 was operating at 90% steady state power. At approximately 0100 on April 2, 1994, a tag out was applied for purposes of making repairs to a valve in the Nitrogen System, SGN-41. The tag out isolated the Nitrogen System from the Isolation Valve Seal Water (IVSW) system. The IVSW system has its own supply of nitrogen in the form of pressurized nitrogen bottles. However, due to a procedural discrepancy, the IVSW nitrogen bottles were isolated. Therefore, the tag out for valve SGN-41 effectively isolated the nitrogen supply to the IVSW tank.

At 0725 an alarm was received in the Central Control Room (CCR) because the IVSW tank pressure was less than 54 psig. An operator was dispatched to investigate the problem per the Alarm Response Procedure. The IVSW tank pressure was found to be at 49 psig. The operator took immediate action to restore the IVSW tank pressure and at 0815 the pressure was greater than the Technical Specification 3.3.C.1.b pressure of 52 psig. There is no Limiting Condition for Operation (LCO) action statement when the requirements of Technical Specification section 3.3.C.1.b cannot be met and therefore Technical Specification 3.0.1 was entered. Because the low pressure condition in the IVSW tank was corrected in less than one hour a plant shutdown was not commenced.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN 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.

FACILITY NAME (1) Indian Point Unit No. 2	DOCKET NUMBER (2) 0 5 0 0 0 2 4 7	LER NUMBER (6)			PAGE (3)		
		YEAR 9 4	SEQUENTIAL NUMBER — 0 0 2	REVISION NUMBER — 0 0	0 2	OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

PLANT SYSTEM IDENTIFICATION

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE

A tag out of the Nitrogen System for a scheduled valve repair concurrent with a procedure discrepancy, which led to a valve mispositioning, created a condition that was prohibited by Technical Specifications, thereby requiring entry into Technical Specification 3.0.1.

EVENT DATE: April 2, 1994

REPORTABILITY DETERMINATION DATE: April 2, 1994

REPORT DUE DATE: May 2, 1994

REFERENCES: Significant Occurrence Report (SOR) 94-193

PAST SIMILAR OCCURRENCES: None

DESCRIPTION OF OCCURRENCE:

Prior to the event, Indian Point 2 was operating at 90% steady state power. Scheduled maintenance was to be performed on valve SGN-41, which is located in the Nitrogen System. In order to isolate valve SGN-41, a tag out was applied at approximately 0100 on April 2, 1994, which isolated SGN-41 from the remainder of the Nitrogen System. Due to the location of SGN-41 in the Nitrogen System, the tag out also isolated the Nitrogen System from the IVSW System. The Isolation Valve Seal Water (IVSW) system has its own supply of nitrogen in the form of pressurized nitrogen bottles. However, due to a procedural discrepancy the IVSW nitrogen bottles were isolated. Therefore, the tag out for valve SGN-41 effectively isolated the nitrogen supply to the IVSW tank.

The IVSW tank is monitored for both level and pressure with alarms in the Central Control Room (CCR). At 0725 an alarm was received in the CCR for IVSW tank pressure less than 54 psig. An operator was dispatched to investigate the problem per the Alarm Response Procedure. The IVSW tank pressure was found to be 49 psig (the minimum design pressure is 47 psig). The operator unisolated the IVSW nitrogen supply to restore the IVSW tank pressure and at 0815 the pressure was greater than the Technical Specification 3.3.C.1.b pressure requirement of 52 psig. There is no Limiting Condition for Operation (LCO) action statement when the requirements of Technical Specification section 3.3.C.1.b cannot be met and therefore Technical Specification 3.0.1 was entered. Since the low pressure condition in the IVSW tank was corrected in less than one hour a plant shutdown was not commenced.

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		9 4	- 0 0 2	- 0 0	0 3	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

ANALYSIS OF OCCURRENCE:

When the supply of nitrogen from the Nitrogen System to the IVSW tank was isolated by the tag out, the nitrogen to the IVSW was effectively isolated since the IVSW System nitrogen supply was not available due to a procedural discrepancy. The nitrogen supply to the IVSW tank is lined up for initial filling and pressurization of the system by the Check Off List (COL). The COL lines up the Nitrogen to the IVSW tank and isolates the IVSW System nitrogen bottles. After the IVSW System is filled and pressurized, Standard Operating Procedure (SOP) 10.4.1 is used to line the system up for normal operation. The procedural discrepancy occurred because there was no mechanism in place to get from the COL to the IVSW SOP. This resulted in the system being lined up per the COL with the IVSW nitrogen system isolated.

The consequences of this discrepancy are considered to be minimal for the following reasons:

1. The IVSW tank pressure never decreased below the design basis analysis value of 47 psig.
2. An alarm in the CCR alerted operators when the pressure in the IVSW tank decreased below 54 psig.
3. Although the system is designed for automatic operation with a supply of nitrogen available to the IVSW tank, an analysis was performed to determine the consequences of having the nitrogen supply isolated. The analysis concluded that at normal IVSW tank level and pressure and the design system leakage, the IVSW system could maintain a pressure greater than the postulated accident pressure in the Vapor Containment (VC) building for 14 hours. This is considered to be more than sufficient time for the operators to respond to a low IVSW tank pressure and take the required manual actions to restore system pressure.
4. The high pressure portion of the IVSW system is isolated during normal operation and requires manual operator action to place it in service. The system is not required by the Emergency Operating Procedures (EOP's) until after termination of the first cycle of high head recirculation, which is estimated to occur approximately 48 hours following the event.

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		9 4 —	0 0 2 —	0 0	0 4	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

CORRECTIVE ACTION:

The IVSW system nitrogen supply was lined up for normal operation per SOP 10.4.1. A Temporary Procedure Change (TPC) to Procedure Checkoff List (PCO) 1 was issued on April 2, 1994, which directed the operator to SOP 10.4.1 to line up the IVSW system for normal operation during plant start up. This TPC will be incorporated as a permanent change to PCO 1 when it is next revised.

As a result of this event and the possibility of system interaction and the effects of a number of modifications made since the plant's original design (i.e. the removal of the Boron Injection Tank (BIT) and its associated nitrogen supply), the design basis for this system is being reconstituted. This reconstitution will provide for additional bulk nitrogen storage in bottles. Minimum bottle pressure will be determined to assure that 24 hours of design conditions can be satisfied without any operator action. Proposed Technical Specification changes to address additional LCO's for the IVSW system are also planned.