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August 26, 1996

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 96-13-00

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

The attached Licensee Event Report LER 96-13-00 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. Jefferey F. Harold, Project Manager
Project Directorate I-1
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US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
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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**

Containment Isolation Valve Position Discrepancies

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	DOCKET NUMBER(S)
07	26	96	96	013	00	08	26	96		0 5 0 0 0
										0 5 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)

POWER LEVEL (10) 100	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(e)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(e)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(e)(2)(vii)	OTHER (Specify in Abstract below end in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(e)(2)(viii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(e)(2)(viii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(e)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **Richard Louie, Engineer** TELEPHONE NUMBER **9 1 4 7 3 6 - 5 6 7 8**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On July 26, 1996, with the plant operating at 100% power, Con Edison notified the NRC pursuant to 10 CFR 50.72 (b) (ii) (B) of discrepancies that were identified between the plant licensing basis, UFSAR and plant procedures for certain non-automatic containment isolation valve positions. These discrepancies were discovered as a result of Con Edison's review of an item within it's 10 CFR 50 Appendix B Corrective Action System. The normal open/closed positions for certain non-automatic containment isolation valves differ from that described in the plant licensing basis documents. Our immediate corrective action has been to document the operability of these valves. These operability determinations have been completed. Additional 10 CFR 50.59 safety evaluations will be performed to support revisions to the UFSAR. Plant operating procedures have been reviewed and revised as necessary to ensure that they are consistent with Technical Specification requirements and the plant licensing basis. The health and safety of the public were not affected by this event.

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

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

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Containment Isolation Valve Position Discrepancies

EVENT DATE:

July 26, 1996

REPORT DUE DATE:

August 26, 1996

REFERENCE:

CITRS Nos. 96-E01651, 96-E01666, 96-E01678, 96-E01683, 96-E01786, 96-E01582, 96-E01599, 96-E01600, 96-E01601

PAST SIMILAR OCCURRENCES:

None

DESCRIPTION OF OCCURRENCE:

On July 26, 1996, with the plant operating at 100% power, Con Edison notified the NRC pursuant to 10 CFR 50.72 (b) (ii) (B) of discrepancies for certain non-automatic containment isolation valves, which may constitute a condition outside the plant licensing basis. An in-depth review was initiated by Con Edison personnel, the scope of which included all containment isolation valves shown on UFSAR Table 5.2-1 and Technical Specification Table 3.6-1. A total of fourteen containment isolation valves, both automatic and non-automatic, have been identified as having open/closed valve positions which differ from that described within the UFSAR. These discrepancies were discovered during a detailed review of UFSAR Table 5.2-1, Technical Specification Table 3.6-1, and the plant operating procedures. One discrepancy associated with Valve 863 also affects the ability to operate certain pneumatic instrumentation required for Appendix R safe shutdown. Our immediate corrective action has been to document the

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

operability of these valves. Operability determinations have been completed for all identified valve position discrepancies. Additional 10 CFR 50.59 evaluations are being completed which will support revisions to the UFSAR. Plant operating procedures have been reviewed and revised, as necessary to ensure that they are consistent with Technical Specification requirements and the plant licensing basis.

ANALYSIS OF OCCURRENCE:

As a result of an item within our 10 CFR 50 Appendix B Corrective Action Program concerning containment isolation valves, an in-depth review of the UFSAR was initiated by Con Edison. This review focused on the accuracy of the data reflected within UFSAR Table 5.2-1, "Containment Piping Penetrations and Valving", Technical Specification Table 3.6-1, "Non-Automatic Containment Isolation Valves Open Continuously Or Intermittently for Plant Operation", and the associated system operating procedures. Actual field verifications of the containment isolation valve open/closed positions were also performed by Operations personnel. A total of fourteen discrepancies have been identified which impact the normal open/closed valve positions shown on UFSAR Table 5.2-1. All of these discrepancies have been determined to not adversely affect the operability of the valves. Six of these discrepancies change the "Normal Position" shown on UFSAR Table 5.2-1 from "Open" to "Closed." With respect to achieving containment isolation, this positional change is more conservative than the open position now stated on UFSAR Table 5.2-1. This is also their present administratively controlled normal positions. Another six of these discrepancies result in adding a clarification to the "Normal Position" shown on the UFSAR Table 5.2-1 for certain valves to reflect intermittent operation of those valves during normal plant operation. Finally, two of these discrepancies represent clarifications to the table which reflect the original design of the system. Safety evaluations will be completed to document all revisions to the UFSAR. In addition, procedural reviews and enhancements have been completed to assure that plant procedures are consistent with Technical Specification requirements and the plant licensing basis.

CAUSE OF OCCURRENCE:

In the case of Valve 863, the cause of this occurrence is attributed to the unanticipated increase of the system design requirements for nitrogen within containment which necessitated an operational need to deviate from the normally closed position shown on UFSAR Table 5.2-1. A safety evaluation has been completed which documents this change to the UFSAR. The discrepancies associated with UFSAR Table 5.2-1 are as a result of changes to the operational needs of the plant. For a majority of the items, the required revisions are more conservative with respect to

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assuring containment isolation in the event of an accident. This particular section of the UFSAR was evaluated as required by NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations." Since that time, the normal operational requirements for certain containment isolation valves changed. These changes were reflected in the associated system operating procedures. However, this was not conducted in accordance with established administrative controls for ensuring compliance with the UFSAR and licensed design basis of the plant.

CORRECTIVE ACTION:

Immediate corrective action has been to document the operability of these valves. Operability determinations have been completed for all identified valve position discrepancies. Additional 10 CFR 50.59 evaluations will be conducted to support needed revisions to the UFSAR. Plant operating procedures have been reviewed and revised as necessary to ensure that they are consistent with Technical Specification requirements and the plant licensing basis.