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April 10, 1997

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 96-19-01

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

The attached Licensee Event Report LER 96-19-01 is hereby submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B).

Very truly yours,



Attachment

cc: Mr. Hubert J. Miller
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
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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) **050002471** PAGE (3) **1 OF 04**

TITLE (4) **Plant Shutdown Technical Specification 3.0.1, H-2 Recombiners**

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)
0	9	18	96	019	01	04	10	97		050000
										050000

OPERATING MODE (9) **N**

POWER LEVEL (10) **100**

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

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **Robert T. Allen, Engineer** TELEPHONE NUMBER **914 734-5129**

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)

During a scheduled walkdown of seismic supports, a System Engineer questioned the adequacy of the seismic supports for instrument air tubing for the valves that control hydrogen flow (FCV-2A and FCV-2B) to 21 and 22 Hydrogen Recombiners. A stress analysis performed could not confirm operability of the instrument air tubing to valves FCV-2A and FCV-2B. Accordingly both Hydrogen Recombiners were declared inoperable (Technical Specification 3.3.G.1) and the plant was declared outside its design basis. A plant shutdown was commenced in accordance with Technical Specification 3.0.1. After additional clamps were installed, one train of the instrument air tubing was deemed operable, and the shutdown was terminated.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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) 0500024796	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		96	019	01	02	OF 04

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:

Instrument air tubing that provides control of Hydrogen Recombiner valves FCV-2A and FCV-2B could not be confirmed to be seismically supported.

EVENT DATE:

September 18, 1996

REPORT DUE DATE:

October 18, 1996

REFERENCES:

CITRS 96-E02147, CITRS 96-E02153

PAST SIMILAR OCCURRENCES:

None

DESCRIPTION OF OCCURRENCE:

While the unit was operating at 100 percent power on September 18, 1996, a system engineer conducting a scheduled walkdown of seismic supports questioned the adequacy of the seismic support of the instrument air tubing associated with Hydrogen Recombiner valves FCV-2A and FCV-2B. In May, 1996, a walkdown of the Chemical Volume and Control System (CVCS) discovered some seismic supports, unrelated to the current event, which were then in a degraded condition. Corrective actions from the May, 1996, event included providing enhanced training to the system engineers on identifying degraded seismic supports during system walkdowns and increasing the sensitivity towards inspections of seismic supports during system walkdowns. Based on ensuing training which reinforced that small instrument air tubing should be supported approximately every five (5) feet, it appeared to the system engineer in the instance described here that an additional seismic support might be required on the instrument air tubing, since there

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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.

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

DESCRIPTION OF OCCURRENCE: (continued)

was a span of greater than five (5) feet without a seismic support. A stress analysis was performed and the results could not confirm operability of the instrument air tubing to valves FCV-2A and FCV-2B. Both Hydrogen Recombiners were declared inoperable (Technical Specification 3.3.G.1) at approximately 1800 hours and a plant shutdown was commenced in accordance with Technical Specification Limiting Condition for Operation (LCO) 3.0.1. After additional clamps were installed on the instrument air tubing for valve FCV-2B, the as left condition was then deemed acceptable, and 22 Hydrogen Recombiner was declared operable. Technical Specification 3.0.1 was exited, Technical Specification LCO 3.3.G.2.a was entered (providing that one hydrogen recombiner or its associated flow path may be inoperable for a period not to exceed 30 days), and the shutdown was terminated at approximately 2000 hours. Additional clamps were also installed on the tubing for FCV-2A, which resulted in 21 Hydrogen Recombiner being declared operable at approximately 2245 hours on September 18, 1996. This in turn provided for exiting LCO 3.3.G.2.a. The Hydrogen Recombiners are not required for use until 13 days after a loss of coolant accident (UFSAR Section 6.8.2.1, Technical Specification 3.3.G Basis). Valves FCV-2A and FCV-2B are located in the immediate vicinity of the Hydrogen Recombiner control panels, and adequate time would have been available to affect any repairs required to the instrument air tubing should a degraded condition actually have occurred and the operation of the Recombiners had been required. This LER is being written pursuant to 10CFR50.73 (a)(2)(i)(B), providing for reporting of any operation or condition not in concurrence with the plant's Technical Specification.

ANALYSIS OF OCCURRENCE:

A field inspection of the seismic Class I tubing in question determined that the supports may have been inadequate. A detailed root cause analysis to determine the cause of this event is in progress. Past work orders and modification packages pertaining to this equipment and equipment located in close proximity have been identified, and the job histories are currently being reviewed.

CAUSE OF OCCURRENCE:

Investigation has determined that the tubing was impacted during modification MMC-78-2-04, which installed Lo Flow By-pass valves FCV 3403 and 3402, and test valves in the instrument air tubing. This modification was installed in August 1979. The seismic adequacy of the additional valves, piping, and tubing was not addressed in any of the documentation associated with the modification at that time, even though it was a Class "A" system. The instructions provided were to "install valves per Drawings...", and "piping is to be field run and supported". These instructions were vague.

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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)

CORRECTIVE ACTIONS:

Immediate corrective action was to install additional clamps on the tubing to valves FCV-2A and FCV-2B, and to continue the system walkdowns of seismic supports for additional systems.

Additional corrective actions are that:

- 1) all system engineers will receive training to identify degraded supports;
- 2) all operations, maintenance, engineering, and quality assurance personnel will be informed of the importance of pipe supports, and that if supports are removed or disturbed, they must be returned to their original condition; and
- 3) piping supports for a minimum of ten (10) systems located outside of the containment will be inspected to ensure their seismic adequacy.

These actions will be completed by July 30, 1997.