Paul H. Kinkel
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5923

April 2, 1998

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 98-02-00

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

The attached Licensee Event Report LER 98-02-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73

Very truly yours,

Paul Kinkel

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
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

IE22

NRC FORM 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-104
EXPIRES: 4/30/92
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.

LICENSEE EVENT REPORT (LER)

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

TITLE (4)

Overpressure Protection System Inoperable Due to Supports Found in Degraded Condition

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 3	0 2	9 8	9 8	- 0 0 2	- 0 0	0 4	0 2	9 8	NONE	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: *(Check one or more of the following)* (11)			
POWER LEVEL (10) 0 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER *(Specify in Abstract below and in Text, NRC Form 336A)*
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	X 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)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Richard T. Louie, Senior Engineer	AREA CODE 9 1 4 7 3 4 - 5 6 7 8

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
X YES *(If yes, complete EXPECTED SUBMISSION DATE)*	NO		0 7	3 0	9 8

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

On March 2, 1998, with the plant at cold shutdown, Con Edison personnel were performing an inspection of various small-bore piping, and tubing located within the vapor containment building. Various discrepancies were identified, including instrumentation tubing and tubetrack which were found to have missing and/or improperly mounted supports. At the time of these discoveries, it was uncertain whether these conditions adversely affected the operability of their respective systems, structures, or components. Initial review of the as-found conditions for instrument tubing associated with pressure transmitters PT-402 and PT-413 did not appear to satisfy design requirements. These pressure transmitters provide reactor coolant system loop pressure measurement and perform various safety-related functions. Specifically, PT-413 provides input to the overpressure protection system (OPS) which is required to be operable per Technical Specification 3.1.A.4. As a result of the degraded conditions affecting PT-413, the OPS was declared inoperable. An immediate notification was made in accordance with 10 CFR 50.72 (b). The health and safety of the public were not affected by this event.

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Overpressure Protection System Inoperable Due to Supports Found In Degraded Condition

EVENT DATE:

March 2, 1998

REPORT DUE DATE:

April 2, 1998

REFERENCE:

Condition Identification and Tracking System (CITRS) No. 98-E01675

PAST SIMILAR OCCURRENCES:

None

DESCRIPTION OF OCCURRENCE:

On March 2, 1998, with the plant at cold shutdown, Con Edison personnel were performing an inspection of various small-bore piping, and tubing located within the vapor containment building. A number of instrumentation tubing and tubetrack were found to have missing and/or improperly mounted supports. At the time of these discoveries, it was uncertain whether these conditions adversely affected the operability of their respective systems, structures, or components. Initial review of the as-found conditions of instrument tubing for pressure transmitters PT-402 and PT-413 did not appear to satisfy design requirements. These pressure transmitters provide reactor coolant system loop pressure measurement and perform various safety-related functions. PT-402 provides indication of reactor coolant system loop pressure in the control room, and provides inputs to the reactor vessel level indication system, and the post-accident saturation margin monitor. PT-402 also provides a permissive signal which prevents the opening of residual heat removal system valve 730 when it is not desired. PT-413 provides

indication of reactor coolant system loop pressure in the control room, and provides input to the overpressure protection system (OPS). Per Technical Specification 3.1.A.4, the OPS is required to be operable whenever the reactor coolant system temperature is less than or equal to 305 degrees F. Since the plant was at cold shutdown the OPS was required to be operable. Due to the degraded condition of the instrument tubing for PT-413, the OPS was declared inoperable.

ANALYSIS OF OCCURRENCE:

Following identification of the degraded instrument tubing and tubetrack supports, a preliminary operability assessment was performed to determine if the supports or tubing could perform their function under design load conditions. Based upon the assessment of the as-found conditions it was determined that the OPS was inoperable. The instrument tubing and tubetrack supports for PT-402 and PT-413 are Seismic Class I. Subsequent engineering analyses were performed. These analyses confirmed the initial determination that the as-found conditions of the instrument tubing affecting PT-413 adversely affected the operability of the OPS when it was required to be operable.

CAUSE OF OCCURRENCE:

This event was initiated by an inspection of various small-bore piping, and tubing located within the vapor containment building. The degraded condition of the instrumentation tubing and tubetrack supports was determined to affect instrumentation required for control room indication and OPS operation. The as-found degraded tubing for PT-413 led to the conclusion that the OPS was inoperable resulting in the plant being in a condition outside it's design basis. The cause for these degraded conditions are under investigation and has not yet been determined.

CORRECTIVE ACTION:

Immediately upon the identification of these degraded instrument tubing and tubetrack supports, a preliminary operability assessment was made based upon the as-found conditions. As a result of Technical Specification 3.1.A.4, it was determined that the OPS was inoperable resulting in the plant being in a condition outside design basis. The appropriate 10CFR50.72 notification was subsequently made. The cause for these degraded conditions are under investigation and have not yet been determined. Corrective actions to prevent a recurrence of this event will be identified later and provided to you in a supplement to this report.