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May 13, 1999

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 1999-006-00

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

The attached Licensee Event Report 1999-006-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

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 Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
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US Nuclear Regulatory Commission
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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)

Indian Point No. 2

DOCKET NUMBER (2)

05000-247

PAGE (3)

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TITLE (4)

Plant Operation in Condition Prohibited by Technical Specifications

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 NAME	DOCKET NUMBER
04	13	1999	1999	-- 006	-- 00	05	13	1999		05000
										05000

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)					
N		20.2201(b)		20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(viii)
		20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)
POWER LEVEL (10)	099	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
James J. Maylath, Senior Engineer	(914) 734-5356

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/>	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 13, 1999, while reviewing a surveillance test, PT-M48, "480 Volt Undervoltage Alarm," in preparation for scheduled work the following day, the Senior Watch Supervisor reviewed the Technical Specifications to determine if any limiting conditions of operation (LCOs) were potentially applicable to the performance of this test. The test requires the actuation of a test switch that results in bypassing the two degraded voltage relay contacts that provide degraded voltage protection for the associated 480-volt bus supply breaker. Technical Specifications require at least one degraded voltage channel on each 480-volt bus be operable when the plant is above cold shutdown. This 480-volt alarm test had been performed on a monthly basis for each of four 480-volt buses since 1984. Since this 480-volt alarm test bypassed both degraded voltage channels by bypassing the two degraded voltage relay contacts, the plant operated in a condition prohibited by Technical Specifications for approximately ten minutes each time the test was performed with the plant above cold shutdown.

The surveillance test was postponed, and it was subsequently revised to test only the low voltage alarm, as required by Technical Specifications, which can be tested without disabling the degraded bus voltage relays.

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

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Plant Operation in Condition Prohibited by Technical Specifications

EVENT DATE:

April 13, 1999

REPORT DATE:

May 13, 1999

REFERENCES:

Condition Reporting System (CRS) No. 199903031

PAST SIMILAR OCCURRENCE:

None.

DESCRIPTION OF OCCURRENCE:

On April 13, 1999, with the unit at 99% power, the Senior Watch Supervisor (SWS) was reviewing surveillance test, PT-M48, "480 Volt Undervoltage Alarm," which was scheduled to be performed the following day. PT-M48 provided for testing the degraded voltage relays and observing the alarm that is actuated by these relays. He noted that during the performance of PT-M48, a test switch that opens the trip coil circuit of the associated 480-volt bus supply breaker is actuated. This permits actuation of the degraded voltage relays without tripping the associated 480-volt bus supply breaker. However, when the test switch is actuated, both degraded voltage relay channels (each channel consists of one degraded voltage relay) are bypassed. Technical Specification Table 3.5-3, No. 3.b requires at least one degraded voltage relay channel be operable, otherwise operator action must be taken to bring the plant to cold shutdown.

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

ANALYSIS OF OCCURRENCE:

PT-M48 had been performed monthly on each 480-volt bus with the test switch bypassing both degraded voltage relay channels since 1984, when the test switches were installed. Each time PT-M48 was performed with the plant above cold shutdown and with the test switch bypassing both degraded voltage relay channels, the plant was in a condition prohibited by Technical Specifications. This is reportable under 10 CFR 50.73(a)(2)(I)(B). The test procedure tested both the low voltage alarm, as required by Technical Specifications, and the degraded bus voltage relays (which are not required by the current Technical Specifications). The test included checking the timing relays in the degraded bus voltage circuit. These timing checks of the degraded voltage timer relays determine the amount of time that the degraded bus voltage trip is bypassed. The total time that the test switches bypass the degraded voltage relay channels is typically less than ten minutes for each test. Therefore, the plant was in a condition prohibited by Technical Specifications for approximately ten minutes or less during the performance of these tests with the plant above cold shutdown.

There were no adverse safety implications as a result of the monthly performance of PT-M48. The conditions during the performance of these tests did not cause any injury to the public or to personnel or damage to equipment.

CAUSE OF OCCURRENCE:

Technical Specification Table 3.5-3, No. 3.b was approved with Amendment No. 74 to the Indian Point 2 Technical Specifications. The NRC Safety Evaluation issued with this amendment approved monthly testing of the undervoltage alarm relays and refueling interval testing for the degraded voltage relays, as presently appears in Technical Specification Table 4.1-1, No. 29.b and c. Station records indicate that a meeting between NRC staff and Con Edison in July of 1982 addressed testing of the degraded bus voltage relays. These meeting notes indicate that the NRC desired Con Edison to test the degraded bus voltage relays on a monthly basis, and that Con Edison was also requested to revise the Technical Specifications accordingly. Although Con Edison did implement a modification to provide for the installation of a test switch to bypass the degraded voltage relay channels during testing and revised PT-M48 to provide for monthly testing of the degraded voltage relays, no Technical Specification change was ever made to allow its use, or require the testing.

The root causes of this event were inadequate tracking of the commitment by Con Edison to submit a Technical Specification change, in accordance the NRC staff request at the July 1982 meeting, and a failure to recognize that the Technical Specification change was required before the testing requested by the NRC could be performed in accordance with existing Technical Specifications.

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TEXT: (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTION:

Following the identification of this event on April 13, 1999, PT-M48 was revised to test the 480-volt alarm relay on a monthly interval in accordance with the present Technical Specification Table 4.1-1, No. 29.c. A Technical Specification amendment, following the guidelines on degraded voltage relay testing from the July 1982 meeting and present Standard Technical Specifications, will be prepared and submitted by July 30, 1999.

Present administrative procedures, such as the Condition Reporting System, would preclude a recurrence of this event by formally identifying and tracking the action requested by the NRC. The submittal of the Technical Specification amendment by July 30, 1999 will be tracked by CRS No. 199903031.