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November 6, 1989

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. William Russell
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Diesel Fire Pump Valve Test - Special Report

Section 3.13 of the Technical Specification requires that the two (2) main motor-driven fire pumps and one diesel-driven fire pump be operable and properly aligned to the high pressure fire header and that all piping and valves necessary for proper functioning of any portion of the system required for protection of safe shutdown systems be operable.

The above specification provides that any one inoperable condition may exist at any one time provided that the inoperable equipment be restored within seven (7) days. If the seven (7) days requirement cannot be met then a report is to be submitted within the next 30 days outlining plans to restore the equipment to operable conditions.

The Technical Specification Section 4.14.A.1.F requires that a monthly valve position check of the system be performed. During this test as performed on October 13, 1989 it was discovered that valve FP-701 leading from the diesel-driven fire pump to the high pressure fire header was closed. The valve was opened shortly thereafter on the same day.

Further investigation revealed that valve FP-701 was closed on October 1, 1989 and had remained in the closed position until the test was performed. The seven (7) day inoperable period was thereby exceeded.

Valve FP-701 was inadvertently closed in connection with work being done to repair hydrant No. 16. This hydrant receives its feed from the high pressure fire header. Valve FP-53 supplies, or isolates, hydrant No. 16. Valve FP-53 is in close physical proximity to FP-701 which was mistaken for FP-53 and closed. Closure of the incorrect valve was the result of human error.

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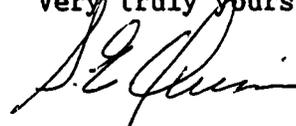
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The corrective action taken was to re-open valve FP-701 on October 13, 1989. Actions to prevent recurrence include the following measures.

- 1) The supervisor and the nuclear plant operator were given formal interviews by the Operations Manager and the Assistant Operations Manager to emphasize the importance of assuring correct identification of equipment. Disciplinary action was also taken.
- 2) The covers and valve wells for outdoor, underground fire header valves will be color-coded to distinguish between low and high pressure headers.
- 3) The outdoor, underground fire header valves will be labeled with better tags.
- 4) In future work on fire hydrants, the hydrants will be isolated and drained prior to excavation to assure that the correct tagout has been accomplished.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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