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Vice President

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December 23, 1992

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

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

SUBJECT: Inoperable High-Pressure Water Fire Protection System Due to Valve Replacement

The purpose of this letter is to satisfy the requirement of Technical Specification 3.13.A.3.b.ii to submit a special report within 14 days following the occurrence of an inoperable high-pressure water fire protection system. This report is to outline the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status. Verbal and written notifications in accordance with Technical Specification 3.13.A.3.b.i were made on December 10 and December 11, 1992, respectively.

Technical Specification 3.13.A.1.a requires that the high-pressure water fire protection system shall have two main motor-driven fire pumps and one diesel-driven fire pump operable and properly aligned to the high-pressure fire header. Technical Specification 3.13.A.3.a allows all three fire pumps to be out of service for 24 hours.

In order to obtain isolation to permit the replacement of a section of piping in the turbine building fire header near the discharge of motor-driven fire pump no. 12, both motor-driven fire pumps, which normally supply the header, were tagged out on December 9, 1992. When adequate isolation could not be obtained, it became necessary to replace the valve that interconnects the yard fire header, which is directly connected to the diesel-driven fire pump, with the turbine building fire header. To decrease the pressure in the yard fire header sufficient to achieve isolation, the automatic start design capability of the diesel-driven fire pump was disabled in order to prevent its start upon loss of pressure in the yard fire header. This action technically rendered the pump inoperable. Therefore, all three fire pumps were deemed to be simultaneously out of service. The diesel-driven fire pump was capable of being manually started, if required, at the direction of the control room operators, by an operator stationed at the pump in radio contact with the control room.

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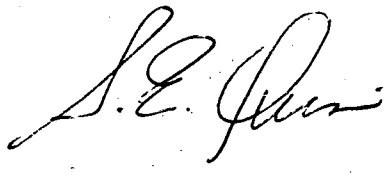
Other precautionary measures taken during the period the three fire pumps were out of service included the stationing of a pumper truck from the Verplanck Fire Department in the turbine building, pre-staging of fire hoses to selected locations, and prohibition on welding, burning and grinding in all areas other than the area where the work described above was ongoing.

The high-pressure water fire protection system was declared inoperable at 0900 hours on December 10, 1992, and was returned to service, within the allowed outage time stated in Technical Specification 3.13.A.3.a, at 1505 hours after the replacement of the valve.

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

Very truly yours,



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