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April 29, 1994

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: Special Report on April 28, 1994 Flow Testing of  
Fire Protection System

We have recently been informed by the responsible NRC Region I Section Chief, that a previous interpretation of the Indian Point Unit No. 2 (IP-2) Technical Specifications provided by the Region I Project Engineer for IP-2 several years ago is no longer valid, and that henceforth, routine testing which necessarily renders all three fire pumps inoperable for even a short time period is to be reported.

The purpose of this letter, pursuant to Technical Specification 3.13.A.3.b.i, is to confirm the telephone notification made to you on April 28, 1994 concerning the inoperability of the high-pressure water fire protection system. In addition, with the information provided below, this letter satisfies the requirement of Technical Specification 3.13.A.3.b.ii to submit a special report within 14 days following the event which outlines the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status.

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.2 allows both motor-driven fire pumps or the diesel-driven fire pump to be out of service provided the inoperable equipment is restored to operable status within seven days. Technical Specification 3.13.A.3.a states that an alternate fire protection system shall be established within 24 hours with the high-pressure water fire protection system inoperable in a manner other than permitted by Technical Specification 3.13.A.2.

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In order to perform a flow test of the fire protection system, which is required by Technical Specification 4.14.A.1.m, it is necessary to disable the automatic start design capabilities of both motor-driven fire pumps and the diesel-driven fire pump. This technically renders all three fire pumps inoperable which is not permitted by Technical Specification 3.13.A.2. The test was performed on April 28, 1994, commencing at 1200 hours and ending at 1555 hours. The duration of the flow test was well within the 24 hour allowed outage time. Therefore, there was no need to establish an alternate fire protection system.

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

Very truly yours,



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