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January 3, 1996

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 January 2, 1996 Inoperability of a Portion
of the High-Pressure Water Fire Protection System Due to
Maintenance Activity

Pursuant to Technical Specification 3.13.A.3.b.i for Indian Point Unit No. 2, this letter confirms the January 2, 1996 telephone notification made to the NRC concerning the inoperability of a portion 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.c requires that the high-pressure water fire protection system shall have all piping and valves necessary for proper functioning of any portion of the system required for protection of safe shutdown systems operable. While Technical Specification 3.13.A.2 allows the requirements of 3.13.A.1 to be modified, the permissive modification provisions do not extend to the piping and valve provisions of 3.13.A.1.c. 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.

In order to perform planned corrective maintenance on a drain valve in a portion of the high-pressure water fire protection system that protects the service water pumps, which are part of a safe shutdown system, it was necessary to temporarily isolate that portion of the header from the motor-driven fire pumps and the diesel-driven fire pump. This rendered piping and valves necessary for proper functioning of a portion of the system required for the protection of a safe shutdown system inoperable,

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thus, the requirements of Technical Specification 3.13.A.3.a were applicable. The isolation was effected on January 2, 1996, commencing at 0120 hours and ending at 0930 hours, well within the 24 hour allowed outage time. Although there was no regulatory requirement to establish an alternate fire protection system within the 24 hour interval, compensatory measures (fire hoses pre-staged at nearby operable hydrants, four hour fire watch tour) were instituted during the time the portion of the header was isolated.

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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