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August 13, 1996

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

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

SUBJECT: Special Report on August 12, 1996 Inoperability of the
High-Pressure Water Fire Protection System Due to Fire Valve Testing

Pursuant to our letter dated April 29, 1994 and Technical Specification 3.13.A.3.b.i for Indian Point Unit No. 2, this letter confirms the telephone notification made to you on August 12, 1996 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 these requirements to be modified to allow any one condition to exist at any one time, namely, either both motor-driven fire pumps or the diesel-driven fire pump can 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.

In order to perform the annual valve cycling test required by Technical Specification 4.14.A.1.g(i), it is necessary to temporarily close the valve which normally interconnects the inner and outer loops of the high-pressure water fire protection system. This action isolates the inner loop from the diesel-driven fire pump and isolates the outer loop from the two main motor-driven fire pumps, which for the duration of the test effectively renders the diesel-driven fire pump out of service for the inner loop and the two main motor-driven fire pumps out of service for the outer loop. Since both conditions exist at the same time, the

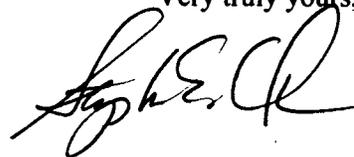
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requirements of Technical Specification 3.13.A.2 are not satisfied. Therefore, the requirements of Technical Specification 3.13.A.3.a are applicable. This isolation was effected on August 12, 1996, commencing at approximately 1005 hours and ending at approximately 1035 hours. The system was restored to the normal alignment well within the 24 hour allowed outage time, thus, there was no need to establish an alternate fire protection system.

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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