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January 10, 1997

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 January 9, 1997 Inoperability of the
High-Pressure Water Fire Protection System Due to Valve
Maintenance

Pursuant to our Fire Protection Program requirements for Indian Point Unit No. 2, this letter confirms the telephone notification made to you on January 9, 1997 concerning the inoperability of the high-pressure water fire protection system. In addition, with the information provided below, this letter satisfies our program requirement 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.

Requirement 2.a.1 of Addendum I of Station Administrative Order (SAO) 703, "Fire Protection Impairment Criteria and Surveillance", 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. It 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. With the high-pressure water fire protection system inoperable in a manner other than permitted by Requirement 2.a.1, Required Action 2.b.1.a states that an alternate fire protection system shall be established within 24 hours, the NRC Region I Office shall be notified within 24 hours of identification, and a special report outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status shall be submitted to the NRC within 14 days following the event.

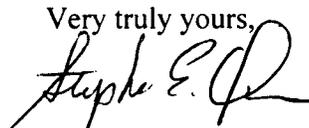
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In order to perform maintenance on a valve, it was necessary to temporarily close the valve which normally interconnects the inner and outer loops of the high-pressure water fire protection system. This action isolates the inner loop from the diesel-driven fire pump and isolates the outer loop from the two main motor-driven fire pumps. To support the maintenance work, it was also necessary to isolate one of the motor-driven pumps from the inner loop. At all times, each loop was aligned to one operable fire pump. However, with the interconnect valve closed and one motor-driven fire pump isolated, the situation existed where the inner loop had one motor-driven fire pump and the diesel-driven fire pump out of service. Therefore, the requirements of Requirement 2.a.1 were not satisfied as two conditions existed at one time for a portion of the high-pressure water header. The requirements of Required Action 2.b.1.a then were applicable. This isolation was effected on January 9, 1997, commencing at approximately 0345 hours and ending at approximately 1632 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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