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Vice President

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August 27, 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 August 20, 1997 Inoperability of the
High-Pressure Water Fire Protection System Due to Valve
Maintenance**

Pursuant to the Fire Protection Program for Indian Point Unit No. 2, this letter represents our twenty-four hour and 14 day program requirement responses for the August 20, 1997 inoperability of the high-pressure water fire protection system. The report outlines the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status.

The program requirement to confirm the telephone notification, made to you on August 20, 1997 by telegraph, mailgram or facsimile transmission no later than the first working day following the event, was not met due to a mis-communication between reporting personnel.

The high-pressure water fire protection system tag-out began at approximately 0230 hours and ended at approximately 2200 hours on August 20, 1997. As the system was restored to the normal alignment within the 24-hour allowed outage time, there was no need to establish an alternate fire protection system.

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. SAO-703 allows this requirement 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 of SAO-703 states that an alternate fire protection system shall be established within 24 hours; that the NRC

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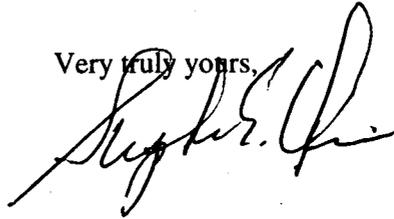
Region I Office shall be notified by telephone within 24 hours of identification and such notification confirmed by telegraph, mailgram, or facsimile transmission no later than the first working day following the event; and that a special report outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to operable status shall be submitted to the NRC Regional Administrator of the Region I office within 14 days following the event.

To perform maintenance on two valves, 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 isolated the inner loop from the diesel-driven fire pump and isolated the outer loop from the two main motor-driven fire pumps, which for the duration of the maintenance activity effectively rendered 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 existed at the same time, Requirement 2.a.1 was not satisfied and Required Action 2.b.1 became applicable. As the system was restored to the normal alignment within the 24-hour allowed outage time, there was no need to establish an alternate fire protection system.

An Open Item Report (OIR) has been issued to investigate why the twenty-four hour program required report was not issued, and what led to the mis-communication.

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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