

November 3, 1998

Mr. A. Alan Blind
Vice President - Nuclear Power
Consolidated Edison Company of
New York, Inc.
Indian Point 2 Station
Broadway and Bleakley Avenues
Buchanan, NY 10511

**SUBJECT: NRC SPECIAL INSPECTION REPORT 50-247/98-16
AND NOTICE OF VIOLATION**

Dear Mr. Blind:

A special inspection was conducted following the failure of a High Efficiency Particulate Air (HEPA) filter in the 25 containment fan cooler unit (FCU) on September 13, 1998, and the identification of HEPA filter deterioration in the 22 FCU on September 16, 1998. Due to a potential common mode failure of the FCUs from this filter deterioration, Con Ed appropriately declared the 21-24 FCUs inoperable and conducted a forced plant shutdown. Our inspection focused on the root cause of the HEPA filter failures, opportunities to previously identify the deterioration of these filters, corrective actions taken or planned as well as the basis for declaring the 21, 23 and 24 FCUs operable without replacing existing HEPA filters, and future plans for establishing a service life for the HEPA filters to ensure they can perform their design function.

Our inspection found your root cause analysis to be thorough and comprehensive and that your filter media testing indicated previously unknown limitations on the service life and service conditions of the HEPA filters. All prior FCU and HEPA filter testing and inspections were found in accordance with Technical Specification requirements. Historic searches and interviews conducted by the NRC and Con Ed did not identify an opportunity for Con Ed could have obtained prior knowledge of similar HEPA filter failures and thus taken steps to prevent them.

Your operability determination for the replaced and remaining FCU HEPA filters provided reasonable assurance of the operability of the HEPA filters based on test data, inspection and engineering judgement, but overall was qualitative in nature. Specifically, since your filter media testing results and information on the service hours of the HEPA filters could not be accurately quantified, you have not been able to establish a definitive service life for HEPA filters. As a result of your inability to establish a finite service life, we believe that Con Edison needs to take a conservative approach regarding the replacement schedule for these filters to ensure they function properly under accident conditions.

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We note that you committed to replace the bottom three rows of HEPA filters in the 21 and 24 FCUs by December 31, 1998, due to their length of time inservice and repeated prior wetting of the filters. This action appears appropriately conservative given the current information available regarding filter degradation, the condition of these filters and the uneven flow distribution through the FCU HEPA filter banks. In addition, we note that you previously requested a Technical Specification amendment which would permit the permanent removal of all of the HEPA filters from the containment FCUs; this amendment is currently being processed by NRR. Therefore, we request that you inform us of your future replacement schedule for FCU HEPA filters and the basis for establishing that schedule within 30 days of the date of this report.

Based on the results of this inspection, the NRC determined that a violation of NRC requirements occurred. The violation involved two examples where procedures and instructions for activities affecting quality were not established. The first example involved the lack of administrative controls for the installation of roughing filters on the FCUs during outages as described in the UFSAR; this contributed to lapses in roughing filter installation which occurred during the last outage. The second example involved the lack of inspection and preventive maintenance of the drains for the safety-related FCU demisters designed to remove entrained water from the air flow stream, resulting in the partial or complete clogging the drains from the long-term accumulation of rust and debris. The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and to prevent recurrence are already adequately addressed in this inspection report. Therefore, you are not required to respond to this violation unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions regarding this letter, please contact Mr. John F. Rogge at 610-337-5146.

Sincerely,

Original Signed by:

Charles W. Hehl, Director
Division of Reactor Projects

Docket No. 50-247
License No. DPR-26

Enclosures:

1. Notice of Violation
2. Inspection Report No. 50-247/98-16

A. Alan Blind

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cc w/encls:

N. Carns, Senior Vice President - Nuclear Operations

J. Baumstark, Vice President, Nuclear Power Engineering

J. McCann, Manager, Regulatory Affairs

C. Jackson, Manager, Nuclear Safety and Licensing

B. Brandenburg, Assistant General Counsel

C. Faison, Director, Nuclear Licensing, NYPA

J. Ferrick, Operations Manager

L. Tucker, Department Manager - Work Management

C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law

P. Eddy, Electric Division, Department of Public Service, State of New York

T. Rose, Secretary - NFSC

F. William Valentino, President, New York State Energy Research
and Development Authority

J. Spath, Program Director, New York State Energy Research
and Development Authority

S. Klokke, Vice President - Engineered Products, Flanders Filter Corporation

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DATE	10/30/98	10/30/98	10/31/98	11/03/98

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