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Mr. Hubert J. Miller  
Regional Administrator – Region I  
US Nuclear Regulatory Commission  
475 Allendale Road  
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Subject: Special Report on the October 13, 1999 inoperability of the  
Post Accident Hydrogen Analyzer.

The purpose of this letter is to submit a special report on the inoperability of the Indian Point Unit No. 2 Containment Hydrogen Concentration Monitor pursuant to Technical Specification 6.9.2 h.

Technical Specification 3.5.6 and Table 3.5-5 require that the Containment Hydrogen Concentration Monitor, which is a post-accident monitoring instrument, be operable when the reactor coolant system is above 350 F. The specification requires that if an inoperable monitor is not restored to operable status within 7 days, an alternate method of monitoring containment hydrogen must be initiated and a special report be submitted within the next 14 days. This report must outline the action taken, the cause of the inoperability, and the plans and schedule for restoring the monitor to operable status.

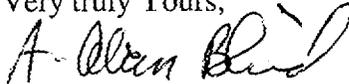
Failure of multiple components in the heat tracing circuits for the sample lines to the monitor resulted in declaring the monitor inoperable on October 12, 1999. Engineering determined that the heat trace was required to support the operation of the monitor in the accident condition to prevent excessive condensation in the sample lines from fouling the monitor. The monitor itself is available but may not function as intended during accident conditions. Since this equipment is required to be operable when the reactor coolant system temperature is above 350 F, and this condition apparently existed when the plant was heated above 350 F, the seven day allowed outage time was started when the reactor coolant system was heated above 350 F. This transition occurred at 0010 hours on October 10, 1999.

*IKZ*

Procedures for an acceptable alternate method of monitoring containment hydrogen concentration were put in place on October 15, 1999, prior to the end of the seven-day allowed outage time, thereby satisfying the Technical Specification requirements for continued plant operation. The alternate method entails the manual collection of a containment atmosphere sample and the transport of this sample for analysis to Indian Point 3, owned by the New York Power Authority.

The completion of the heat trace repairs and projected return to service date of the containment hydrogen concentration monitor is November 12, 1999.

Very truly Yours,



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