



Indian Point Energy Center  
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August 7, 2006

Re: Indian Point Unit 2  
Docket 50-247

NL-06-083

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Report on Inoperable Post Accident Monitoring Instrument LT-3300

**REFERENCE:** NRC Issuance of Indian Point 2 Emergency Amendment Re: Containment Sump Indication (TAC No. MD2655), dated July 28, 2006.

Dear Sir:

The purpose of this letter is to submit a report pursuant to Technical Specification (TS) 5.6.6. Condition B of TS 3.3.3 requires a report to be submitted within 14 days of exceeding the allowed outage time of Condition A of TS 3.3.3 for specified Post Accident Monitoring (PAM) instruments. Pursuant to TS 5.6.6, the report is to outline the alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrument to operable status.

PAM instrument LT-3300 is required to be operable in Modes 1, 2, and 3 by TS 3.3.3, Table 3.3.3-1, Function 6 "Containment Water Level (Containment Sump)." During a recent containment pressure reduction an unexpected response by LT-3300 was identified. A review of past level transmitter recordings indicated that LT-3300 was responding to increases and decreases in containment pressure. On July 24, 2006, LT-3300 was declared inoperable. Condition C of TS 3.3.3 was entered since the LCO for this function required the operability of three instrument channels (i.e., LT-940, LT-941 and LT-3300) and two were inoperable (i.e., LT-940 and LT-3300). The referenced Technical Specification change removed LT-940 from the TS requirements and Condition A was applied for LT-3300. Entergy Nuclear Operations, Inc. (Entergy) does not plan to repair LT-3300 until the next refuel outage or a suitable forced outage and is, therefore, submitting this letter to meet TS requirements. The planned deferral of work on LT-3300 is based on the harsh work environment (i.e., high radiation fields and ambient temperature inside the crane wall), the uncertain nature of the problem (inspections will be required to establish the cause of the failure), and the potential inability to perform on-line post work testing, based on the nature of the repair.


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An alternate method of monitoring for LT-3300 is LT-941 in the Containment Sump, and LT-939 and LT-3301 in the Recirculation Sump. LT-939 and LT-941 illuminate a series of five lights in the Control Room as preset limits are exceeded. LT-3301 is a differential pressure transmitter and provides a continuously indicated level. LT-939 is powered from one safeguards train and LT-941 and LT-3301 are powered from a separate train. The planned corrective action for LT-3300 is to repair the transmitter during the next refuel outage scheduled the spring of 2008 or a forced outage, if practicable.

There are no new commitments being made in this submittal.

If you have any questions or require additional information, please contact Mr. Patric W. Conroy, Licensing Manager, at 914-734-6668.

Sincerely,

  
Mr. Patric W. Conroy  
Licensing Manager  
Indian Point Energy Center

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR  
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1  
NRC Resident Inspector, IP2  
Mr. Paul Eddy, New York State Dept. of Public Service