

January 6, 2000

EA No. 1999-326

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

SUBJECT: NRC-EVALUATED EMERGENCY PREPAREDNESS EXERCISE - INSPECTION  
REPORT NO. 05000247/99012

Dear Mr. Blind:

This letter refers to the NRC emergency preparedness exercise inspection led by Ms. N. McNamara, at Indian Point Nuclear Generating Station, Unit 2, Buchanan, New York, during the period of September 21-23, 1999. The inspection was performed to verify the adequacy of corrective actions for NRC findings from the last full-participation exercise conducted on June 23, 1999 and documented in NRC Inspection Report No. 50-247/98-07. The inspectors evaluated your emergency response capabilities as demonstrated by the performance of your emergency response organization during an exercise on September 22, 1999. The findings were presented to you and others in various conference calls prior to and including October 5, 1999, an onsite meeting October 7, 1999, and concluding with a final telephone discussion on December 22, 1999.

During the inspection, the NRC identified two exercise weaknesses: 1) multiple exercise findings in the Technical Support Center which included, the managers not providing adequate direction or guidance to staff, technical staff not being fully utilized or the staff failing to provide needed support; and 2) multiple exercise findings in the Operations Support Center which included, managers not keeping in-plant teams apprised of changing radiological conditions and inadequate demonstration of the use of repair teams. The inspection team concluded that the causes for the findings were generally related to communications problems, staff proficiency in the use of applicable procedures, several instances of inadequate procedural steps and an inadequate critique process.

More importantly, these findings indicate an overall inability to detect and correct these problems and their causes. There were five repeat findings and one repeat exercise weakness identified from previous NRC-evaluated exercises. Your organization's critique for the subject exercise did not identify these specific problems nor their recurrence. In light of the repetitive findings and training problems noted in this area, the inspectors noted that there was an apparent ineffectiveness in the emergency preparedness training process and a weak oversight of the emergency preparedness program.

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Due to the number of repetitive findings and importance of these exercise weaknesses a management meeting was held at your facility on October 7, 1999 with you, and others from your organization to discuss: 1) your assessment and views of the significance of the exercise weaknesses; and 2) your proposed corrective actions (both short and long term) to address the exercise weaknesses. The NRC found your proposed short term corrective actions to be acceptable with the understanding that the long term goals will be completed by March, 2000. Also, you committed to conducting another exercise for NRC evaluation in June 2000. Please respond to this letter if we have any misunderstandings in this regard or if you intend to change these commitments.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred: 1) failure to identify and correct weak or deficient conditions; and 2) failure to declare an Unusual Event for an August 31, 1999 Loss of Offsite Power Event. These violations are being treated as Non-Cited Violations (NCVs), consistent with VII.B.1.a of the Enforcement Policy (64 FR 61142, November 9, 1999). These NCVs are described in the subject inspection report. If you contest the violation or severity level of the NCV, you should provide a response within 30 days of the date of this inspection report, with the bases for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region I, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Indian Point 2 facility.

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

Sincerely,

**ORIGINAL SIGNED BY:  
BRIAN E. HOLIAN FOR**

Wayne D. Lanning, Director  
Division of Reactor Safety

Docket No. 050-000247

**Enclosures:**

1. Inspection Report No. 050-000247/99012
2. October 7, 1999 Meeting Handout

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cc w/encl:

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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

FEMA, Region II

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 no objections

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