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Vice President

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March 30, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: Response to NRC Integrated Inspection Report 05000247/1999011

Dear Sir:

On March 16, 2000, Consolidated Edison of New York, Inc. (Con Edison) received the Nuclear Regulatory Commission (NRC) Inspection Report 1999011, transmitting the results of safety inspections conducted by NRC at Indian Point 2 (IP2) during the period of December 8, 1999 through January 24, 2000. The inspection report states that the inspectors reviewed the Indian Point 2 Recovery Plan, Revision 3, and found that in some cases the corresponding year 2000 IP2 Business Plan implementing actions have inconsistencies, performance metric weaknesses, and absences of completion dates. Therefore, the NRC requested Con Edison to provide the date by which these Business Plan deficiencies will be resolved so that the NRC can schedule an inspection for the completion of Recovery Plan, Revision 3 actions.

Although the intent of the longer-term corrective actions described in the Recovery Plan were captured in the year 2000 IP2 Business Plan, we agree with the results of the inspection report. In some cases, a clear linkage between the Recovery Plan longer-term corrective actions and Business Plan implementing actions does not exist or it is difficult to correlate the actions. Additionally, in some cases the Business Plan implementing actions have inconsistencies, performance metric weaknesses, and absences of completion dates. By April 30, 2000, Con Edison plans to revise, as appropriate, the year 2000 IP2 Business Plan to resolve the specific NRC issues raised in the inspection report.

The year 2000 IP2 Business Plan implements our strategy required for longer-term performance improvements. The chief nuclear officer routinely reviews the implementing actions of this Plan with site department managers to monitor progress. In

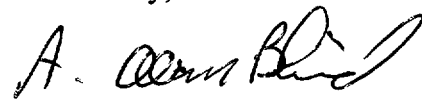
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some cases, specific departmental action plans are adjusted (i.e., due dates, improvement actions) based on results of these progress reviews and/or other assessments. Therefore, the year 2000 Business Plan is a dynamic plan with appropriate management checks and adjustments applied.

To provide a clear linkage, we have developed a cross reference document which links the IP2 Recovery Plan longer-term corrective actions to the year 2000 IP2 Business Plan implementing actions. This table is available for review on-site, and will be incorporated into the Business Plan as part of the next revision.

Attachment 1 summarizes Con Edison's commitments discussed above. If you have any questions, please call me at (914) 734-5340.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Ann Blum". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Attachment

C: Mr. A. Randolph Blough, Director
Division of Reactor Projects, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey F. Harold, Project Manager
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Mr. Hubert J. Miller
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Senior Resident Inspector
U.S. Nuclear Regulatory Commission
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ATTACHMENT 1

RESPONSE TO NRC INTEGRATED INSPECTION REPORT 05000247/1999011

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MARCH 30, 2000

Con Edison - Indian Point Unit 2
Commitments

The following list identifies those actions committed to by Con Edison in this document. Any other actions discussed in this submittal represent intended or planned actions by Con Edison. These actions are described to the NRC for the NRC's information and are not regulatory commitments.

Commitment	Due Date
Con Edison plans to revise the year 2000 IP2 Business Plan to resolve the specific NRC issues raised in the inspection report.	April 30, 2000