



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

April 27, 1998

Mr. Stephen Bram  
Senior Vice President - Central Operations  
Indian Point Unit 2  
Broadway and Bleakley Avenues  
Buchanan, NY 10511

Dear Mr. Bram:

**SUBJECT: NRC RESTART ACTION PLAN FOR INDIAN POINT 2**

The purpose of this letter is to advise you of NRC activities to monitor your actions to restart Indian Point 2. On October 14, 1997, Con Edison elected to shutdown Indian Point 2 to address a problem with repetitive electrical breaker failures. During this outage, other equipment problems as well as needed improvements in station processes were identified that you are in the process of correcting. On March 19, 1998, your staff met with us to describe your plans and schedule for addressing these equipment problems as well as how your current improvement efforts will address broader human performance issues. By Confirmatory Action Letter (CAL) 1-98-005, dated March 26, 1998, the NRC confirmed those corrective actions you committed to take prior to the restart of Indian Point 2 as well as reaffirmed your commitment to conduct an Independent Safety Assessment.

In order to assist Region I and NRR in the coordination of NRC resources for the performance monitoring and assessment of Indian Point 2, the NRC has formed the Indian Point 2 Assessment Panel (IP2AP). This panel was formed and provided with a charter using that guidance which is applicable from NRC Manual Chapter 0350, "Staff Guidelines for Restart Approval." This guidance, where applicable to the unique circumstances surrounding the Indian Point 2 shutdown, will be used to formalize the NRC's review of your ongoing performance improvement initiatives. The main focus of the IP2AP will be monitoring the implementation of your planned restart activities and performance improvement initiatives as identified in CAL 1-98-005.

We have developed a Restart Action Plan (RAP) to track the NRC's review of key Con Edison restart and short-term corrective actions referenced in CAL 1-98-005. Enclosed is an outline of the RAP. Inspection of the items in the RAP will provide the NRC with a base of information necessary to evaluate whether Indian Point 2 has made sufficient improvement to support closure of the CAL. Emergent issues arising during the implementation of the RAP may result in issues being added to the plan.

ITEM # 1

A/1  
(b)

While the staff has tailored this plan to the unique circumstances confronting Indian Point 2, the logic and flow of information generally follow the outline of MC 0350, "Staff Guidelines for Restart Approval." MC 0350 also provides guidance regarding administrative functions and selected internal activities, much of which does not apply given the circumstances surrounding the Indian Point 2 extended corrective action outage and the terms of CAL 1-98-005, dated March 19, 1998. To the extent that this guidance applies to IP-2, it will be addressed by the IP2AP and documented in the IP2AP meeting minutes.

If you have any questions or comments on the IP2AP or our plans for reviewing your commitments in CAL 1-98-005 as contained in the enclosure, please contact John Rogge of my staff at (610) 337-5146.

Sincerely,



Hubert J. Miller  
Regional Administrator

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

Enclosure: Restart Action Plan Outline and Checklist

cc w/encl:

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Enclosure

**INDIAN POINT 2 RESTART ACTION PLAN**

On October 14, 1997, Con Edison elected to shutdown Indian Point 2 to address a problem with repetitive electrical breaker failures. During this outage, other equipment problems as well as needed improvements in station processes were identified that Con Edison is currently correcting. On March 19, 1998, Con Edison met with the NRC to describe its plans and schedule for addressing these equipment problems as well as how current improvement efforts address broader human performance issues. By Confirmatory Action Letter (CAL) 1-98-005, dated March 26, 1998, the NRC confirmed those corrective actions Con Edison had committed to take prior to the restart of Indian Point 2 as well as reaffirmed its commitment to conduct an Independent Safety Assessment.

This plan establishes the NRC's inspection plans prior to restart of Indian Point 2. The expectation is that those identified problems with processes, programs and equipment will be addressed prior to restart as specified in CAL 1-98-005. While every equipment problem in the plant may not be fixed before restart, it is expected that all those significant process weaknesses and equipment deficiencies that Con Edison committed to correct prior to restart will be resolved. This plan identifies specific issues that expect to be completed to ensure compliance with applicable regulatory requirement and the completion of the CAL commitments. Inspection of the items listed will provide the NRC with a base of information necessary to judge whether Indian Point 2 has met their commitments outlined in the CAL to support their decision to return to power operations. Emergent issues arising during the implementation of the plan may result in issues being added. In such cases, the NRC's Indian Point 2 Assessment Panel (IP2AP) will revise this plan as appropriate.

To date, a number of the items in the RAP have already been partially or completely reviewed by the resident inspectors, supplemented in recent months by an additional resident inspector, Division of Reactor Safety (DRS) specialist inspectors and Nuclear Reactor Regulation (NRR) technical support and project management. The results of those inspections are documented in NRC inspection reports beginning with IR 50-247/97-12. The remaining items in the RAP will be reviewed on a schedule consistent with the resolution of each issue and the plant restart schedule. In evaluating the completion of the items in the RAP, the NRC will consider the findings from the various recent NRC inspections, including those from the recent NRC Evaluation Team (NET) which evaluated the Independent Safety Assessment (ISA) conducted at Indian Point 2. The IP2AP will then determine whether all conditions of the CAL were satisfied and promptly feedback to Con Edison any remaining corrective actions needed.

## INDIAN POINT 2 RESTART ISSUES CHECKLIST

### **I. March 26, 1998, Confirmatory Action Letter Issues**

- a) DB-50/DB-75 Breaker Corrective Actions**
- b) Status of/Results of System Readiness Reviews**
- c) Resolution of Surveillance Test Adequacy/Scheduling**
- d) Review of Outage and Non-Outage Backlog for Impact on the Use of Operating Procedures**
- e) Material Condition Assessment of Insulation/Painting Inside Containment**
- f) Programmatic Review of Instrument Setpoints**
- g) Review of Past/Outstanding Operability Determinations**
- h) Verification of AC & DC Instrument Bus Circuitry**
- i) Resolution of Findings from the Containment Large Bore and Small Bore Pipe Support Walkdowns**
- j) Process Controls/Prioritization of the Backlog of Critical Drawing Discrepancies**
- k) Completion of Pre-startup Activities in the Areas of Work Management, Corrective Action, Conduct of Operations and Conduct of Engineering as Specified in CAL 1-98-005**
- l) Review of the Completion of Selected Remaining Con Edison Restart Criteria**
- m) Assessment of the Reviews Conducted by Con Edison of the IP-2 Restart Plan and Satisfaction of the IP-2 Restart Criteria**

**II. Resolution of Selected Findings from the January 1998 NRC Architect-Engineer Team Inspection**

- a) AFW pump overspeed - effect on system integrity (IFI 50-247/98-201-01)
- b) AFW pump steam supply valves nitrogen supply modification (IFI 98-201-02)
- c) AFW pump room temperature calculations (IFI 98-201-03)
- d) Instrument bus power (IFI 98-201-04)
- e) CST level setpoints (URI 98-201-06)
- f) RWST level criterion (IFI 98-201-07)
- g) SI accumulator filling (IFI 98-201-08)
- h) EDG frequency testing (IFI 98-201-11)
- i) EDG #22 fuel tube corrective action (URI 98-201-14)
- j) Agastat relays (IFI 98-201-15)
- k) SI reset relay testing (URI 98-201-16)
- l) Battery condition (URI 98-201-17)
- m) Battery testing deficiencies (IFI 98-201-18)
- n) Weaknesses in corrective action system (IFI 98-201-20)

**III. Current NRC Inspection Issues**

- a) Part Length Control Rod Drive Mechanism Removals
- b) Safety Injection System Lineup During Accumulator Filling
- c) Miswiring of the #21 Emergency Diesel Generator K-3 Relay
- d) Loss of Configuration Control for the Reactor Vessel Head Vent on March 30-31, 1998

**IV. Corrective Actions for Selected Performance Issues Identified by the IP-2 Independent Safety Assessment and the NRC Evaluation Team**