

March 17, 2003

Mr. Raymond Shadis  
Staff Advisor  
New England Coalition  
Post Office Box 98  
Edgecomb, Maine 04556

Dear Mr. Shadis:

I am responding to your email of December 6, 2002 in which you inquired about Indian Point Unit 2 (IP2) material condition, as well as the accuracy of the Updated Final Safety Analysis Report (UFSAR) and plant design documentation. You also questioned whether there was a backlog of changes to the plant when Entergy purchased IP2 that still needed to be reflected in plant diagrams.

The NRC has taken strong action to address concerns that emerged in the 1990's about the maintenance of design basis information at all plants. Indian Point 2, as a plant with recognized performance problems over the past several years, has received increased NRC inspections above the baseline level in the Reactor Oversight Process (ROP). Although their progress has been slow at times, they have made substantial improvements in this and other areas. Entergy continues to address backlogs of plant maintenance items and drawing updates.

As you are aware, in the mid 1990's, concerns emerged throughout the industry that design bases information was not being properly maintained. Considering the potential scope of these concerns and the need to ascertain the extent of the problems, the NRC requested in accordance with 10 CFR 50.54(f) that licensees describe their programs and processes designed to control and maintain the facility's design bases information. The request was sent in a letter on October 9, 1996, to the Chief Executive Officer of each reactor licensee.

Based, in part, on IP2's regulatory performance and NRC's review of ConEd's response to the October 9, 1996 letter, the Region I staff recommended an Architect-Engineer (A-E) Design Team Inspection, the most significant option available, as a followup activity at IP2 to assess the effectiveness of the design control programs. The A-E Design Team Inspection was conducted at IP2 between January 5 and February 6, 1998. The inspection report (IR), No. 50-247/98-201, was issued on March 26, 1998. The inspection assessed the design, installation, operation, and configuration of the Safety Injection (SI), Auxiliary Feedwater (AFW), and Engineering Safeguards Systems System Actuation (ESSSA) systems, and their supporting systems, to ensure they were capable of performing all design and licensing bases safety functions. Although the A-E team did not identify any operability issues, the team identified concerns regarding certain calculations and analyses; the testing of some equipment; the control of system configurations; and procedures for control of plant-specific input data supplied to Westinghouse for use in accident analyses. The team also identified numerous minor discrepancies in the UFSAR.

In a May 2000 letter, the NRC Senior Managers concluded that IP2 warranted an Agency Focus designation because of problems in, among other areas, configuration management/control, engineering support, and equipment reliability. Subsequently, in an October 10, 2000 letter, after completing assessment of multiple findings and performance indicators, the NRC concluded that IP2 performance was in the Multiple / Repetitive Degraded Cornerstone column of the NRC's Action Matrix. Along with human performance and corrective action, issues with design and configuration control underlaid this ROP designation. Per the ROP, this required significant additional oversight action, including a 95003 supplemental inspection.

In January and February 2001, a 14-person broad scope supplemental inspection (Inspection Procedure 95003) was conducted at IP2. The purpose of this inspection was to provide a supplemental assessment of the situation and the underlying causes of the performance problems at IP2. Recognizing that performance problems and weaknesses existed, the NRC assigned the team to independently evaluate whether there was an acceptable margin of safety at IP. As part of the inspection, the team reviewed the design, configuration, operation, and maintenance of the service water (SW) and emergency diesel generator (EDG) systems. Overall, the inspection team concluded that the facility was operated safely, and no operability issues were noted with the EDG or SW systems. However, the team did identify problems similar to those that had been previously identified, particularly in the areas of design control, human and equipment performance, and problem identification and resolution. Although the team noted some performance improvements, progress was slow overall and limited in some areas. One area that needed continued attention was design control for the translation of important design assumptions into plant operating procedures, drawings, calculations, and testing programs. Also, weaknesses were noted with the retrieval, verification, and assurance of the quality of engineering products.

Between February 1997 and September 2001, ConEd completed aspects of the UFSAR verification program and the Design Basis Documentation (DBD) upgrade project. However, some delays occurred due, in part, to 1) the increased program and project scope during the discovery phase, and 2) the prolonged DB 50 circuit breaker and steam generator replacement outages, other emergent equipment problems, and 3) the transfer of the ownership of the facility which diverted resources. In September 2001, Entergy purchased IP2 from ConEd.

You inquired about backlogs of corrective maintenance in the plant and the updating of plant drawings under Entergy's ownership. As you know, virtually all plants carry some backlogs of work items. Entergy has made progress in reducing the corrective maintenance backlog; however, the backlog of elective maintenance items remains high. Additionally, Entergy is tracking and making progress on updating plant drawings to reflect modifications that have been made to the plant. Entergy has now completed the UFSAR verification program. The last of the DBD upgrades are scheduled to be completed this year. Entergy has additional, multi-year efforts ongoing as part of other design basis initiatives.

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In summary, significant NRC inspection, assessment, and oversight resources were and continue to be applied at IP2 to ensure safe operation of the facility and continued performance improvement. Although plant events, such as the event in August 1999, have revealed some system operability issues, numerous NRC inspections and licensee Safety System Functional Assessments did not identify any design issues that rendered systems inoperable. Various NRC inspections also noted that progress, although slow, was being made regarding the adequacy and retrievability of design information. We expect to continue our heightened oversight at Indian Point, as discussed in our Annual Assessment Letter, dated March 4, 2003.

I trust this addresses your questions. If you have any further questions, please contact Mr. Peter Eselgroth at (610) 337-5234.

Sincerely,

/RA by  
Brian E. Holian  
Acting For/

A. Randolph Blough, Director  
Division of Reactor Projects

Mr. Raymond Shadis

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