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DVassallo

Docket Nos. 50-247
and 50-286

Consolidated Edison Company
of New York, Inc.

ATTN: Mr. William Cahill, Jr.
Vice President

4 Irving Place
New York, New York 10003

Gentlemen:

Two incidents have occurred at a nuclear power plant that indicate a deficiency in the control circuit design that warrants a review of the control circuits of all facilities to assure that these types of deficiencies do not exist or are corrected if they do exist. Both incidents involved the inadvertent disabling of a component by racking out the circuit breaker for a different component. In one case, this caused the loss of capability to isolate secondary containment when this capability was required. In the second case, the racking out of a breaker for one pump disabled not only the pump being removed from service but also its redundant counterpart. Both of these occurrences resulted from the use of auxiliary contacts on the movable portion of the circuit breakers in the control circuits of other components. When the breaker is racked out, the control circuit employing these contacts is opened and may be rendered inoperable. A copy of each of the licensee's reports on these two occurrences is enclosed for your information. The licensee's corrective measures for both of these cases included redesign of the control circuits so that racking out the breakers would not render the control circuits of other equipment inoperable.

As a result of these occurrences, we request that you perform a review of the control circuits of all safety related equipment at the Indian Point Nuclear Generating Units 2 and 3 to assure that disabling of one component does not, through incorporation in other interlocking or sequencing controls, render other components inoperable. All modes of tests, operation, and failure must be considered. It appears that in the cases cited above, the racked out position of breakers had not been included in the failure mode analysis of those control circuits.

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Also, your procedures should be reviewed to ensure they provide that, whenever part of a redundant system is removed from service, the portion remaining in service is functionally tested immediately after the disabling of the affected portion and, if possible, before disabling of the affected portion.

This information regarding control circuit design is being requested for nearly completed plants and for operating plants to assure that the deficiencies experienced in operating facilities are not present in other facilities. We have no reason to believe that the same type of deficiencies exist in your facility.

The results of your review are requested within ninety days. This information should be provided with one signed original and thirty-nine additional copies.

Sincerely,

[Handwritten signature]
for

Karl Kniel, Chief
Pressurized Water Reactors
Branch No. 2
Directorate of Licensing

Enclosures:

1. Ltr fm Jersey Central
Power & Light Co
dtd 4/20/72
2. Ltr fm Jersey Central
Power & Light Co.
dtd 10/6/72

ccs: Leonard Trosten, Esquire
LeBoeuf, Lamb, Leiby & MacRae
1821 Jefferson Street, NW
Washington, D. C. 20036

J. Bruce MacDonald, Esquire
New York State Atomic Energy Council
99 Washington Avenue
Albany, New York 12210

Angus MacBeth, Esquire
Natural Resources Defense Council, Inc.
36 West 44th Street
New York, New York 10036

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7411 SURNAME ▶						
DATE ▶	3/29/73	3/29/73	3/29/73	3/30/73	3/30/73	

Consolidated Edison Company - 3 -
of New York, Inc.

cc: Anthony Z. Rolsman, Esquire
Berlin, Rolsman and Kessler
1712 N Street, N. W.
Washington, D. C. 20036

Paul S. Shemin, Esquire
New York State Attorney General's Office
80 Centre Street
New York, New York 10013

Myron Karman, Esquire
Counsel, Regulatory Staff
U. S. Atomic Energy Commission
Washington, D. C. 20545

Honorable William J. Burke
Mayor of the Village
of Buchanan
Buchanan, New York 10511

Atomic Safety and
Licensing Board Panel
U. S. Atomic Energy Commission
Washington, D. C. 20545

Atomic Safety and Licensing
Appeal Board
U. S. Atomic Energy Commission
Washington, D. C. 20545

Mr. Frank W. Karas, Chief
Public Proceedings Branch
U. S. Atomic Energy Commission
Washington, D. C. 20545

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