

William J. Cahill, Jr.  
Vice President

REGULATORY DOCKET FILE COPY

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

January 11, 1978  
Re: Indian Point Unit No. 2  
Docket No. 50-247

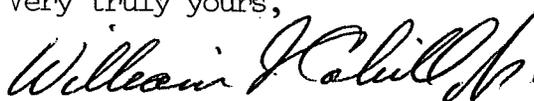
Director of Nuclear Reactor Regulation  
ATTN: Mr. Robert W. Reid, Chief  
Operating Reactors Branch #4  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Reid:

As required by Amendment Number 30 to Facility Operating License DPR-26, we are planning a Steam Generator Inspection Program during the second refueling outage of Indian Point Unit No. 2. This outage is scheduled to commence in February, 1978. As you have requested, we herewith submit as Attachment A to this letter the details of the Steam Generator Inspection Program planned for Indian Point Unit No.2.

Should you or your Staff have any questions regarding this inspection program, we would be pleased to discuss them with you at your convenience.

Very truly yours,



William J. Cahill, Jr.  
Vice President

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ATTACHMENT A

INDIAN POINT UNIT NO. 2

DOCKET NO. 50-247

STEAM GENERATOR INSPECTION PROGRAM

Planned for the  
Second Refueling Outage  
February 1978

INTRODUCTION

The first inservice inspection of the steam generators was performed during the first refueling outage for Indian Point Unit No. 2 which occurred in 1976. Eddy current inspections for tube defects were performed on Steam Generators 21 and 22. In addition, a visual and photographic examination of the first (bottom) tube support plate in all four steam generators was made.

A special inspection of the steam generators was performed during the November, 1976 unit outage. Eddy current inspections for tube denting were carried out on Steam Generators 23 and 24. During this outage, a "hillside port" entry was made in Steam Generator 22. Through this port, an inspection was performed on that steam generator's top (sixth) tube support plate. A description of the program was submitted to the NRC by letter dated October 26, 1976. The results of the inspection were submitted to the NRC by letter dated November 18, 1976.

In April of 1977, another special inspection of the Indian Point Unit No. 2 steam generators took place. This inspection included eddy current examinations for tube denting in Steam Generators 21 and 22. In addition, the lower tube support plates in Steam Generators 21 and 22 were examined and photographed and the top tube support plate in Steam Generator 22 was examined and photographed through the "hillside port". A description of the program was submitted to the NRC by letter dated February 22, 1977. The results of the inspection were submitted to the NRC by letter dated May 6, 1977.

The steam generator inspections planned for this second refueling outage will satisfy both the inservice inspection requirements described in the Facility Technical Specifications and the requirements for a tube denting examination described in Amendment Number 30 to the Facility Operating License DPR-26. The second refueling outage is scheduled to commence in February, 1978.

PROPOSED PROGRAM DESCRIPTION

The following program of steam generator inspections is planned for Indian Point Unit No. 2 during its second refueling outage.

(1) Steam Generator Eddy Current Examination:

A sample group of tubes in the hot legs of Steam Generators 23 and 24 will be eddy current inspected for dents and defects.

The scope of the inspection for defects exceeds the requirements of the Indian Point Unit No. 2 Technical Specifications. The dent inspection will supplement data collected during the eddy current inspection of these two steam generators during the November 1976 steam generator inspection outage.

A standard 700 mil eddy current probe will be used to perform the eddy current testing. If any tube does not permit passage of the standard 700 mil probe, successively smaller probes shall be used until the size of the restriction is quantified. The smallest size probe to be used will be 540 mils. If the tube does not permit this 540 mil probe to pass, either the tube will be plugged, or an evaluation will be performed to demonstrate why the tube need not be plugged. This evaluation will be submitted to the Nuclear Regulatory Commission with the results of this inspection program. In addition, the tubes immediately adjacent to any tube that will not pass the 540 mil probe will be subjected to an eddy current inspection for dents if this inspection has not previously been performed during this outage.

Locations of the hot leg tubes in Steam Generator 23 and 24 which will be eddy current inspected for dents are given in Table 1 and Figure 1. In addition 12% of the tubes in the hot leg of Steam Generator 23 and 6% of the tubes in the hot leg of Steam Generator 24 will be eddy current inspected for defects. To the extent practical, this shall include the length of tube from the point of entry in the steam generator hot leg water box, around the U-bend, and to the top tube support plate of the cold leg.\*

The eddy current inspection for tube defects will be performed nominally at 400 KHz at standard gain. The inspection to identify tube dents will be performed nominally at 400 KHz and at a reduced gain.

\*Because of the small radius bends of the tubes nearer the flow slots (rows 1 through 5) in the steam generators, passage of the probe around the U-bend in these tubes is not practical.

TABLE I

Eddy Current Inspection  
for Dents on Hot Legs of Steam Generators 23 & 24

<u>Row</u>	<u>Column</u>	<u>Number of Tubes</u>
2,3	1 through 35	70
7	1 through 6	6
8	1 through 6, 88 through 92	11
9 thru 12	2 through 6, 88 through 91	36
13 thru 15	3,4,5,6 and 88,89,90	21
16	4,5,6	3
21	7,10,13,16,19,22,25,28,31,34, 37,40,43	13
28,29	11 through 17, 76 through 82	28
30	12 through 17,19,22,25,28,31 34,37,40,43 and 76 through 81	21
31,32,33	15,16,17,76,77,78	18
34	15,16,76,77	4
35	17,16	2
41	27 through 40,54 through 66	27
42	29 through 64	36
43	32 through 61	30
44	35 through 58	24
45	39 through 54	16
3,6,9,12,15 18,21,24,27	46,52, and 58	27
	total	<u>393</u>

Note: (1) Six of these locations in Steam Generator 24 have been plugged and will not be eddy current tested. These six locations are Row 44, Columns 36, 37, 38, 54, 55, and 56.

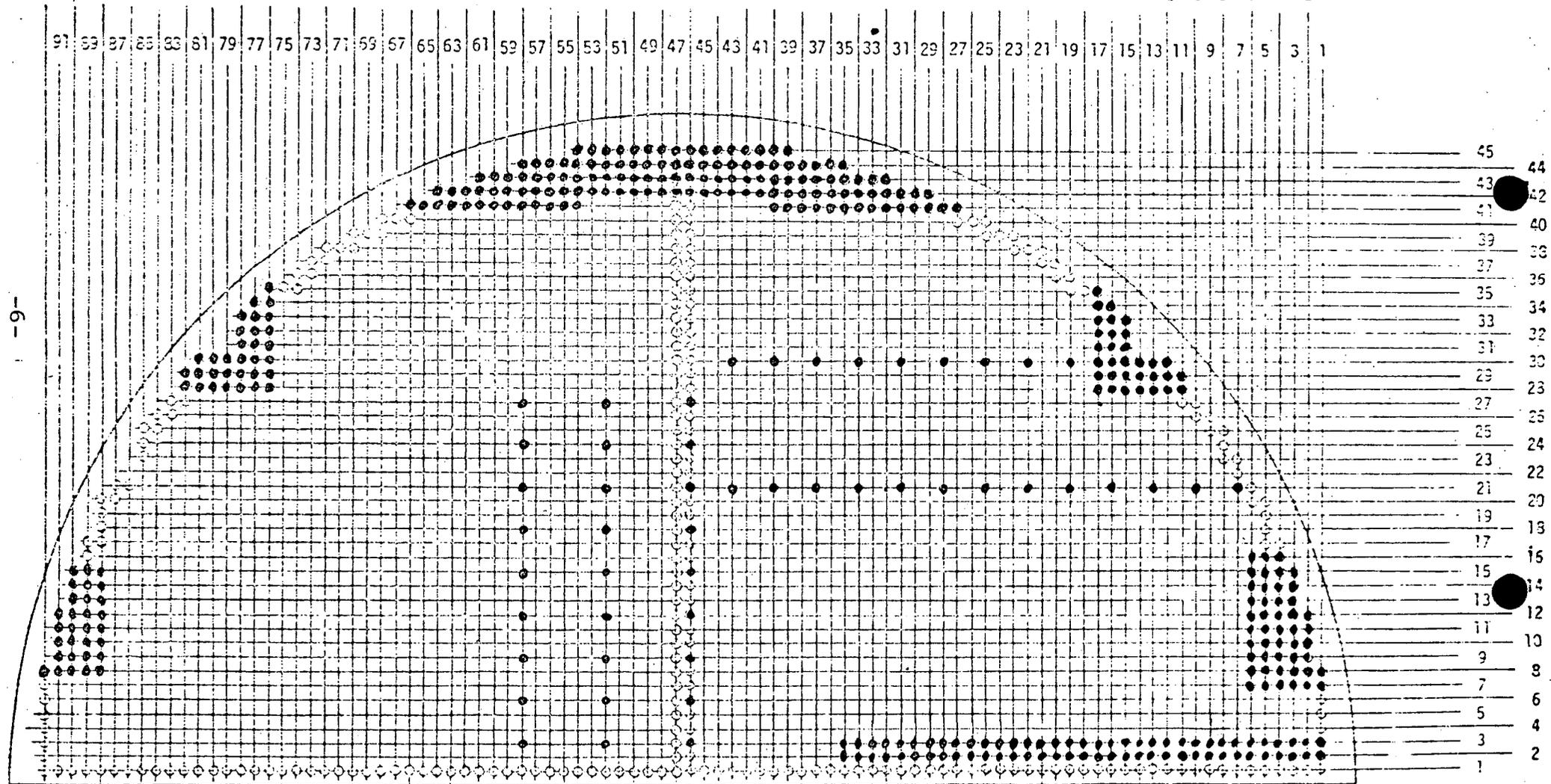
(2) Row 1 tubes in all four steam generators were plugged during the construction phase when modifications were made to the water box divider plates of each steam generator. Tubes in Row 1, therefore, will not be inspected.

**FIGURE I : Locations of Tubes to be Eddy Current Tested for Dents (Hot Legs of Steam Generators 23 & 24)**

COLUMNS

92 90 88 85 84 82 80 78 76 74 72 70 68 65 64 62 60 58 56 54 52 50 48 46 44 42 40 38 36 34 32 30 28 26 24 22 20 18 16 14 12 10 8 6 4 2

91 89 87 85 83 81 79 77 75 73 71 69 67 65 63 61 59 57 55 53 51 49 47 45 43 41 39 37 35 33 31 29 27 25 23 21 19 17 15 13 11 9 7 5 3 1



ROWS

← RAILWAY

NOZZLE →

(2) Flow Slot and Support Plate Inspections

Using the hand holes above the tube sheet for all four steam generators, a visual and photographic examination of the tube support plates will be made. Data obtained from this inspection will be reviewed for indications of cracking in the tube support plates in the vicinity of the flow slots and for "hour glassing" of the flow slots. In the event that significant distortion of flow slots is found, additional inspections may be performed.

Five new 7/16 inch diameter inspection ports are planned to be installed in Steam Generator 24. These inspection ports will be provided at the levels of five of the six tube support plates in the steam generator. It is planned to visually examine the tube support plates through these inspection ports, to provide information relative to the condition of the plate ligaments.

(3) Additional Inspections

Con Edison is currently evaluating with several vendors the feasibility of removing tube and tube support plate samples from the Indian Point Unit No. 2 steam generators. If these operations are feasible and are performed, the findings will be reported to the Nuclear Regulatory Commission subsequent to our examination of the samples.

(4) Evaluation and Reporting of Results

The results of the planned inspection at Indian Point Unit No. 2 will be evaluated by Con Edison. A report of these evaluations will be provided to the Nuclear Regulatory Commission as soon as it is available.

William J. Cahill, Jr.  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N.Y. 10003  
Telephone (212) 460-3819

October 31, 1978

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

Director of Nuclear Reactor Regulation  
ATTN: Mr. Victor Stello, Jr., Director  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Stello:

By letter dated August 31, 1978, you requested additional information regarding our facility fire protection program. Responses to the staff positions and questions contained in Enclosures 1, 2 and 4 of that letter were provided by our letter dated September 18, 1978. We are hereby providing our remaining response to Enclosure 3 of your letter as Enclosure 1 of this letter.

Should you or your staff have any additional questions regarding our fire protection program, we would be pleased to discuss them with you.

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Very truly yours,



William J. Cahill, Jr.  
Vice President

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ENCLOSURE 1

Responses to Staff Positions  
on Administrative Controls  
(Contained in Enclosure 3 of  
August 31, 1978 NRC letter)

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2

Docket No. 50-247

October, 1978

Staff Position AC-1

1. Identify the upper level offsite management position which has overall management responsibility for the fire protection program including periodic assessment of the effectiveness of the Indian Point-2 fire protection program.

Response

The Vice President - Power Generation has overall management responsibility for the fire protection program including periodic assessment of the effectiveness of the program.

Staff Position AC-2

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:
  - (a) Responsibilities of the fire brigade members in a fire emergency should be assigned to each brigade member or brigade position. These responsibilities should not conflict with the brigade member's responsibilities under normal plant conditions.

Response

Assignments of Fire Brigade members are defined in the Plant Emergency Plan. However, specific duties of personnel combatting a fire are designated at the scene by the brigade leader based on his assessment of the fire and the detailed knowledge of the area that each brigade member possesses. Since all members of the brigade receive the same training in handling equipment and combatting fires, the flexibility afforded by this approach permits the most judicious assignment of personnel.

Personnel required to maintain the plant in a safe condition during a fire situation have not been assigned to the fire brigade.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (b) The fire brigade member's qualification requirements should include satisfactory completion of a physical examination for performing strenuous activity, and satisfactory completion of the fire brigade training.

Response

Qualification requirements meet the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:
- (c) The training provided to fire brigade members should include classroom instruction in the following:
    - (1) Identification of the fire hazards and associated types of fires that could occur in the plant, and an identification of the location of such hazards.
    - (2) Identification of the location of fire fighting equipment for each fire area, and familiarization with layout of the plant including access and egress routes for each area.
    - (3) The proper use of available fire fighting equipment, and the correct method of fighting each type of fire. The types of fires covered should include electrical fires, fires in cables and cable trays, hydrogen fires, flammable liquid and waste/debris fires.
    - (5) The proper use of communication, lighting, ventilation, and emergency breathing equipment, in a fire situation.
    - (8) The proper method for fighting fires inside buildings and tunnels.
    - (9) Detailed review of fire fighting procedures and procedure changes.
    - (10) Review of latest plant modifications and changes in fire fighting plans (since the last instruction period).

Response

Fire brigade classroom instruction meets the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:
  - (c) The training provided to fire brigade members should include classroom instruction in the following:
    - (4) Indoctrination in the plant fire fighting plan with specific coverage of each individual's responsibilities.

Response

All fire brigade members receive the same training and are qualified to perform any function required in combatting fires.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(c) The training provided to fire brigade members should include classroom instruction in the following:

(6) The direction and coordination of the fire fighting activities (fire brigade leaders only).

(7) The toxic characteristics of potential products of combustion.

Response

Fire brigade classroom instruction will be modified to include the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(d) Regular planned meetings held every 3 months should repeat the classroom instruction program over a two year period.

Response

The present classroom instruction program does repeat the classroom fire protection instruction over a two year period. However, regularly planned meetings are held 3 times per year rather than every 3 months. Since the overall objective of a two year reinstruction period is met, we believe the above guidelines are presently satisfied. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (e) Practice sessions should be held for fire brigade members on the proper method of fighting the various types of fires which could occur in a nuclear power plant. These sessions should provide brigade members with experience in actual fire extinguishment and the use of emergency breathing apparatus under strenuous conditions. These practice sessions should be provided at regular intervals but not to exceed 1 year for each fire brigade member.

Response

Annual practice sessions including "hands on" fire fighting are provided for fire brigade members at the Company's Ward's Island fire school. However, because of personnel rescheduling due to vacations, plant outages, sickness etc., it is possible that not every fire brigade member will receive retraining within a 12 month period. Controls will be established to ensure that the retraining for these brigade members will not exceed eighteen (18) months.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (f) The comparison to BTP 9.5-1 states that drills should simulate fires and various fire conditions that would be anticipated in a fire emergency. In addition, fire drills should include the following:
  - (1) Assessment of fire alarm effectiveness, time required to notify and assemble the fire brigade and selection, placement and use of equipment.
  - (2) Assessment of each brigade member's knowledge of his role in the fire fighting strategy for the area assumed to contain the fire; and assessment of the brigade member's conformance with established plant fire fighting procedures and use of fire fighting equipment, including self-contained emergency breathing apparatus, communication equipment, and ventilation equipment, to the extent practicable.
  - (3) Assessment of the brigade leader's direction of the fire fighting effort, as to the thoroughness, accuracy, and effectiveness.

Response

Fire drill assessment meets the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(f) The comparison to BTP 9.5-1 states that drills should simulate fires and various fire conditions that would be anticipated in a fire emergency. In addition, fire drills should include the following:

(4) Performance of drills at regular intervals, but not to exceed 3 months for each fire brigade. At least one drill per year should be performed on a "back shift" for each fire brigade. A sufficient number of these drills, not less than one for each fire brigade per year, shall be unannounced, to determine the fire readiness of the plant fire brigade leader, brigade, fire protection systems and equipment.

#### Response

Present performance of fire drills meets the above guidelines. However, since the composition of the fire brigade changes due to shift rotations, vacations, sickness etc., it is possible that not every brigade member will be included in a drill within a 3 month period. Controls will be established to ensure that in no case will any brigade member be permitted to go more than six (6) months without having participated in a fire drill.

"Backshift" drills are scheduled for a time when the minimum number of personnel are on site. This time period may include weekends as well as the daily night shift.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(f) The comparison to BTP 9.5-1 states that drills should simulate fires and various fire conditions that would be anticipated in a fire emergency. In addition, fire drills should include the following:

(5) Preplanning of the drills to establish the training objectives of the drill. The drills should also be critiqued to determine how well the training objectives have been met. Unannounced drills should have their critiques performed by members of the management staff responsible for plant safety and security. At three year intervals, drills should be critiqued by qualified individuals independent of the plant staff.

#### Response

Preplanning and evaluation of fire drills meets the above guidelines. To provide improved documentation, the objectives of the fire drill will be included in the fire drill evaluation report. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:
  - (g) The comparison indicates that a permit system is used for all welding and burning operations, but does not identify who must authorize the permit. All welding and burning work permits should be authorized by the responsible foreman or supervisor. The foreman or supervisor should have received training in potential fire hazards and precautions that should be taken. Before issuing the permit, the responsible foreman or supervisor should physically survey the area where the work is to be performed and establish that the following precautions have been accomplished.
    - (1) All moveable combustible material below and within a 35 foot radius of the cutting, welding, grinding, or open flame work has been removed. (See NFPA 51B)
    - (2) All immovable combustible material below and within a 35 foot radius has been thoroughly protected by asbestos curtains, metal guards, or flameproof covers, and fire extinguishers, hose, or other firefighting equipment are provided at the work site. (See NFPA 51B)

#### Response

The welding and burning permit system in use at Indian Point meets the above guidelines including signature approval by a responsible supervisor. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(h) Fire notification procedures should be developed, to include the following:

- (1) Actions to be taken by the individual discovering the fire, such as, notification of the control room, sounding alarms and actuation of local fire suppression systems.
- (2) Actions to be taken by the control room operator upon report of a fire or receipt of alarm on control room annunciator panel, such as: announcing location of fire over PA system, sounding fire alarms and notifying the shift supervisor and the fire brigade leader of the type, size, and location of the fire.
- (3) Actions to be taken by the fire brigade after notification by the control room operator of a fire, including: location to assemble; directions given by fire brigade leader; and responsibilities of brigade members such as selection of fire fighting equipment and transportation to fire location, selection of protective equipment, use of fire suppression systems operating instructions, and use of preplanned strategies for fighting fires in specific areas.
- (4) Actions to be taken by Plant Superintendent and his staff, and Security Guards after notification of a fire.

#### Response

Fire notification procedures meet the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

(h) Fire notification procedures should be developed, to include the following:

(5) Actions to be taken that will coordinate fire fighting activities with offsite fire departments, including: identification of individual responsible for assessing situation and calling in outside fire department assistance when needed; identification of individual who will direct fire fighting activities when aided by offsite fire fighting assistance. The procedures should also describe the offsite fire department's resources and estimated response time by the offsite fire department to provide assistance to the station.

#### Response

Fire notification procedures will be amended to incorporate the above guidelines. This will be documented in a future revision to the fire protection program description.

Information on the resources and response time of offsite fire departments will be included in the fire notification procedures to assist in the decision making process. While we will try to keep such information as current as possible, availability of the offsite fire fighting equipment is beyond Con Edison's control and, therefore, we will not assume the responsibility for the accuracy of any such listings.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (i) Provisions should be established for including off-site fire fighting organizations in fire brigade drills at least once per year and for training offsite fire department personnel in basic radiation principles, typical radiation hazards, and precautions to be taken in a fire involving radioactive materials in the plant.

Response

Fire drills and health physics lectures for offsite fire fighting organizations currently meet the above guidelines. This will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (j) Fire fighting strategies should be developed for fighting fires in all safety related areas and areas which may present a hazard to safety related areas. These strategies should be provided in a format that affords quick reference in a fire situation and that can also be used in the training program. These strategies should include information to assist fire fighting activities, including:
  - (1) Identification of combustibles in each plant zone covered by the specific fighting strategy.
  - (2) Fire extinguishants best suited for controlling the fires associated with the combustible loadings in that zone and the nearest location of these extinguishants.
  - (3) Most favorable direction from which to attack a fire in each area, in view of the ventilation direction and access hallways, stairs and doors. All access and egress routes that involve locked doors should be specifically identified in the strategy with the appropriate precautions and methods for access specified.
  - (4) Identification of plant equipment that should be managed (i.e., de-energized or cooled) to reduce the hazard potential during a local fire.
  - (5) Assignment of responsibilities to brigade positions, including command control of the brigade, fire hose laying, applying the extinguishant to the fire, advancing support supplies to the fire scene, communication with the control room, coordination with outside fire departments.
  - (6) Identification of radiological and toxic hazards in fire zone.
  - (7) Control of ventilation system operation for fire containment or smoke clearing operations.
  - (8) Operations (e.g., application of particular extinguishant or de-energizing equipment) requiring control room and shift engineer coordination or authorization.

Response

Fire fighting strategies will be developed to meet the above guidelines with the exception of item (5). As noted in the response to staff position 2(a), all members of the fire brigade receive the same training and are given specific assignments by the brigade leader. These facts will be documented in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (k) The validity of the preplanning strategies should be tested by appropriate full-dress drills to check the logic of the strategy, the adequacy of the equipment, personnel understanding, and to uncover unforeseen problems.

Response

Fire drills meet the above guidelines with the exception of testing of the preplanning strategies. The latter item will be developed and incorporated into the fire protection program description as part of the committed actions included in response to item (j).

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:
  - (1) The comparison to BTP 9.5-1 does not describe the inspections performed on fire protection systems. Inspections should be performed to include the following:
    - (1) Inspections of installation, maintenance and modification of fire protection systems; to assure conformance to design and installation requirements.
    - (2) Inspection of penetration seals and fire retardant coating installations to verify the activity is satisfactorily completed.
    - (3) Inspections of cable routing to verify conformance with design requirements, following routing of new cabling.
    - (4) Measures to assure that inspection personnel are independent from the individuals performing the activity being inspected and are knowledgeable in the design and installation requirements for fire protection.
    - (5) Inspection procedures, instructions, and check lists which provide for:
      - . Identification of characteristics and activities to be inspected
      - . Identification of the individuals or groups responsible for performing the inspection operation
      - . Acceptance and rejection criteria
      - . A description of the method of inspection
      - . Recording evidence of completing and inspecting an installation, maintenance, or modification activity
      - . Recording results of the inspection operation

Response

Those portions of the fire protection system which could affect the operation of or are required for protection of safety related or safe shutdown systems will be controlled by a quality assurance program which will meet the above inspection guidelines. A discussion of the quality assurance program for the fire protection system will be included in a future revision to the fire protection program description.

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (m) Following modification, repair or replacement, sufficient testing using appropriate NFPA and other standards is performed to demonstrate that fire protection systems are operational and will perform satisfactorily in service. Written test procedures for installation tests incorporate the requirements and acceptance limits contained in applicable design documents.

Response

Modifications, repairs or replacement of those portions of the fire protection system which could affect the operation of or are required for protection of safety related or safe shutdown systems will be controlled by a quality assurance program which will meet the above testing guidelines. This item will be developed and incorporated into the fire protection program description as part of the committed actions included in response to item (1).

2. The comparison of the Indian Point-2 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-2 fire protection program:

- (n) The comparison to BTP 9.5-1 describes the reporting of unsafe conditions, but does not address the more in-depth review and resolution required for more significant or repetitive occurrences.

In the case of significant or repetitive conditions adverse to fire protection, such as fire incidents or recurring failures of a fire protection system, the cause of the condition should be determined and analyzed, and prompt corrective actions taken to preclude recurrence of the same or similar conditions. The cause of the conditions and the corrective action taken should be promptly reported to cognizant levels of management for review and assessment.

#### Response

A procedure to meet the above guidelines will be instituted.

This will be documented in a future revision to the fire protection program description.

William J. C. Jr.

President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N.Y. 10003  
Telephone (212) 300-3819

October 30, 1978

RE: Indian Point Unit Nos. 1, 2&3  
Docket Nos. 50-3, 50-247 & 50-286

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region 1  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

The following 30-day report is being submitted in accordance with section 4.2.1.3. of the Environmental Technical Specification Requirements (ETSR) for Indian Point Unit Nos. 1, 2&3 which requires, in part, that the NRC be notified in writing within 30 days when milch animals are no longer present at a location or when milk can no longer be obtained from that location. This report is to notify you that the milk sample due September 30 from Strawtown Dairy, located 7.0 miles SSW of Indian Point, was unobtainable because Strawtown Dairy has ceased operation.

To satisfy Environmental Technical Specification Requirements a new milk sampling location was chosen using data from the milch animal survey conducted this year. The new location was chosen to be as close to the plant as possible based on the availability of milch animals in the area. The new site is Windsor Farm, which is located approximately 10.1 miles ENE of the plant in the town of Somers. Windsor Farms, like Strawtown Dairy, is located outside of the 15 mrem/yr isodose line so that a monthly milk sample will be collected from there beginning in October 1978. Even though milk samples are no longer collected from Strawtown Dairy, other pathways to man in that sector will continue to be monitored. These include leafy green vegetables, well water, and Hudson River sediment and vegetation. This will insure that the Nuclear Environmental Monitoring Program will meet its objectives.

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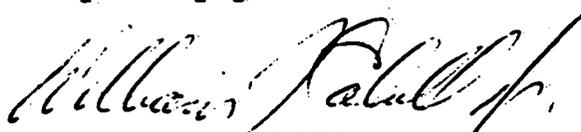
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In addition, we are replacing the milk sampling control station at Crowley Milk Company in Newburgh with Shenandoah Farm, which is located 19.6 miles NNE from Indian Point in East Fishkill. Crowley Milk Company is in the milk processing business and does not own any milch animals. As such, they process milk from dairy farms located throughout the area, which results in an uncertainty as to the origin of the milk sample we obtained from them. Therefore, replacing Crowley with Shenandoah Farms, which maintains milch animals on location, will increase the effectiveness of our milk sampling program.

These changes will be incorporated into a future revision of the ETSR.

Very truly yours



William J. Cahill, Jr.  
Vice President

Copies: Mr. John G. Davis, Acting Director  
Office of Inspection and Enforcement  
c/o Distribution Services Branch, DDC, ADM  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. George T. Berry  
General Manager & Chief Engineer  
Power Authority of the State of New York  
10 Columbus Circle  
New York, New York 10019

William J. Cahill, Jr.  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

REGULATORY DOCKET FILE COPY

October 3, 1978

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

Director of Nuclear Reactor Regulation  
ATTN: Mr. A. Schwencer, Chief  
Operating Reactors Branch No. 1  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

REGULATORY DOCKET FILE COPY

Dear Mr. Schwencer:

In response to your letter to September 13, 1978 in which you requested a schedule for submittal of our revised analysis of ECCS cooling performance, Westinghouse has advised us that their current schedule to provide us with the results of their ECCS reanalysis for Indian Point Unit No. 2 is November 30, 1978. Based on the Westinghouse schedule, with appropriate time for our review, we expect to submit our revised analysis for Indian Point Unit No. 2 by December 31, 1978.

Very truly yours,



William J. Cahill, Jr.  
Vice President

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