

LAW OFFICES OF  
LEBOEUF, LAMB, LEIBY & MACRAE  
1821 JEFFERSON PLACE, N.W.  
WASHINGTON, D. C. 20036

ARVIN E. UPTON  
EUGENE B. THOMAS, JR.  
LEONARD M. TROSTEN  
HARRY H. VOIGT  
LEX K. LARSON  
WASHINGTON PARTNERS

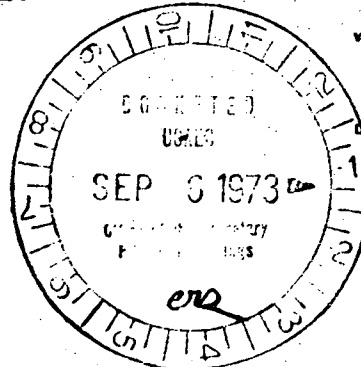
September 4, 1973

ONE CHASE MANHATTAN PLAZA  
NEW YORK, N. Y. 10005

WASHINGTON TELEPHONE  
202 FEDERAL 8-0111

CABLE ADDRESS  
LALALU, WASHINGTON D. C.

Anthony Z. Roisman, Esq.  
Berlin, Roisman & Kessler  
Fourth Floor  
1712 N Street, N. W.  
Washington, D. C. 20036



Re: Consolidated Edison Company  
of New York, Inc.  
Indian Point Unit No. 2  
AEC Docket No. 50-247

Dear Mr. Roisman:

Enclosed is a copy of a letter from Mr. Zarakas  
to Mr. Brunner, dated August 24, 1973.

Very truly yours,

LEBOEUF, LAMB, LEIBY & MACRAE  
Attorneys for Applicant

By

*Edward L. Cohen*

Edward L. Cohen

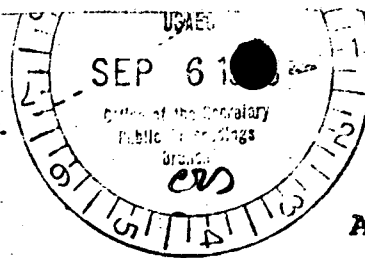
BY HAND

Enclosure

cc w/enc: Samuel W. Jensch, Esq.  
Mr. R. B. Briggs  
Dr. John C. Geyer  
Myron Karman, Esq.  
Angus Macbeth, Esq.  
J. Bruce MacDonald, Esq.  
Hon. Louis J. Lefkowitz  
Secretary, U. S. Atomic Energy Commission (2)  
Atomic Safety and Licensing Board Panel

8110290084 730904  
PDR ADOCK 05000247  
G PDR

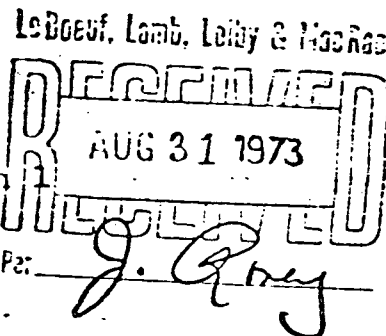
Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N.Y. 10003  
Telephone (212) 460-5042



August 24, 1973

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

Mr. Eldon J. Brunner, Chief  
Facility Test and Startup Branch  
U.S. Atomic Energy Commission  
Directorate of Regulatory Operations, Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406



Dear Mr. Brunner:

This letter is in response to your letter to Mr. William W. Lapsley regarding the inspection on June 11-13, 18-19, 26, 1973 and your letter to Mr. Lapsley dated July 30, 1973.

In response to the enclosure entitled "Description of Violations" applicant states as follows:

Item 1

As reported in our May 28, 1973 letter to the Directorate of Licensing, this occurrence resulted from the deviation from standard operating procedures. The procedures in question have been evaluated to assure that they are clear and sufficient. Additionally, the need for strict adherence to all of these procedures at all times has been re-emphasized to cognizant operating personnel. For these reasons, and for the reasons stated in our report of the abnormal occurrence dated May 29, 1973, we are confident that there were no safety implications to the occurrence. No further remedial action is believed to be required.

Item 2

Your letter stated that, contrary to the requirements of Technical Specification 6.1.B.1.d, documentation was lacking to verify that a review of AO-3-2-3 and AO-3-2-7 had been performed by our Nuclear Facilities Safety Committee as stated in the reports to the Directorate of Licensing on these occurrences.

Mr. Eldon J. Brunner

- 2 -

August 24, 1973

A review of the Nuclear Facilities Safety Committee records indicates that documentation does exist that these abnormal occurrence reports were reviewed by the Committee prior to their submittal to the Commission. A report on AO-3-2-3 was sent to the Committee members for individual review on May 17, 1973 and a report on AO-3-2-7 was sent on June 6, 1973. However, documentation of the results of the individual review by the members was not maintained. These two abnormal occurrences were further reviewed however by the NFSC during a meeting of the Committee at Indian Point Station on June 26, 1973. Documentation relating to this meeting has been maintained.

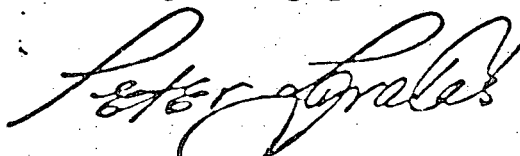
In the future, records to reflect the comments of the members in an individual review will be maintained by the Secretary of the NFSC.

Additionally, your letter to Mr. William W. Lapsley requested an identification of those portions of the R.O. Inspection Report No. 50-247/73-11, which, pursuant to Sections 2.790 and 9.5 of the Commission's Rules and Regulations, contain information which is exempt from public disclosure.

We understand that information in the referenced document which was prepared by personnel of Regulatory Operations does constitute trade secrets, inventions and discoveries and/or proprietary data of the Westinghouse Electric Corporation within the meaning of Section 9.5 (a) (4) (i) of the Commission's Rules and Regulations. By this letter, therefore, Consolidated Edison makes application to withhold those portions of the disclosure in accordance with the Commission's Rules. Those pages of the referenced document containing proprietary information are attached hereto with the proprietary data deleted.

Should you have any further questions on these matters, I will be pleased to discuss them with you.

Very truly yours



- (4) The operating procedures for the instrument air system are being reviewed by the Nuclear Facilities Safety Committee.
- (5) The set point of the station air alternate supply has been lowered to 80 psig from 90 psig. This is an attempt to make the L.P. alarm (at 90 psi) more meaningful. The operator tended to become callous and overlook the alarm since there were excessive alarms due to cycling around the 90 psi set point. This item remains open until the ESR has been resolved.

6. Zero Power Physics Tests

a. Isothermal Moderator Coefficient

The isothermal moderator coefficient agrees to within 3pcm/°F of predictions which is within the acceptance criteria. The following table is presented for Measured vs Expected Values:

<u>Configuration</u>	<u>Measured pcm/°F</u>	<u>Expected* pcm/°F</u>
D @ 197 steps		
C @ 208, D @ 0		
C, D, @ 0		
A @ 188-1/2, B, C, D @ 0		
A @ 8-1/2, B, C, D @ 0		

This item is considered closed.

b. Measured Differential Boron Worth

The measured value is noted as pcm/ppm. This appears to be close to the generally accepted value of pcm/ppm. This is considered closed.

c. Zero Power Integrated Bank Worth



The data for the integral bank worth was reviewed. The total worth expected with N minus 1 (B-6, control rod Bank B) was measured as pcm and an expected value of pcm.

This is considered closed.

d. Boron Endpoints

The all rods out endpoint measured was ppm, the Westinghouse expected value is ppm. In general boron endpoints are

considered acceptable when they are within   ppm of expected. The following table shows some example values:

<u>Configuration</u>	<u>Boron Concentration Measured ppm</u>	<u>Boron Concentration Expected</u>
All Rods out D, C, B in All Rods in RCCEG out		

This item is considered closed.

7. Test Data\*

a. Part Length Rod Control System Checkout Data

The final data review by Engineering remains to be completed.

This item remains open.

b. Rod Position Indication System

The inspector reviewed the letter from Engineering accepting the results as satisfactory. The letter is dated 25 June 1973. This item is considered closed.

c. In-Core Thermocouples and Resistance Temperature Detectors (RTD) Cross Calibration

The reviewed files contain WEDCO acceptance of results. There still remains a final review and acceptance by Engineering. The licensee plans to re-run portions of this test. This item remains open.

8. Quality Assurance

The inspector discussed with the licensee the current plans for an audit schedule for Indian Point. The licensee has a tentative 2 year plan where specific audits will be conducted. The audits are divided by quarters and areas to be audited. The licensee referenced their document designated QA 7320 Rev. 0 (Draft) Con Ed Co. Audit Program for Operational Nuclear Facilities.

The inspector questioned coverage of the program as it involves the transient phase of the nuclear plant in preoperational, startup and accension to power.