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October 8, 1971

United States Atomic Energy Commission  
Division of Compliance, Region 1  
970 Broad Street  
Newark, New Jersey 07102

Attention: Mr. James P. O'Reilly, Director

Gentlemen

This letter is in response to your letter of September 23, 1971 which requested our comments on two items that ~~you~~ cited appeared to be in nonconformance with statements in our Unit #2 Final Safety Analysis Report and Part 50 of the Commission Regulations.

Regarding the items referenced in the enclosure to your letter, we forward herewith our comments and steps which have been or will be taken to prevent recurrence, and the date all corrective actions or preventive measures were or will be completed.

Item 1: The FSAR, page 5.2-11, states that, "The large butterfly valves used to isolate the containment purge ducts are equipped with air-diaphragm operators, with spring returns capable of closing the valves in two seconds."

Contrary to the above these containment purge valves are equipped with piston operators, with air reservoirs, and do not contain spring returns.

A change in design such as described has been made. We erred in not requesting approval when the desirability of the change became apparent. We discussed this matter by telephone on September 27, 1971 with your Mr. Glenn Madsen and Mr. Carl Kneil DRL. They agreed that the substitution of the piston operators, with air reservoirs for the air

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diaphragm operators with spring returns was acceptable as an equivalent design. Appropriate documentation is being dispatched to the Division of Reactor Licensing on October 8, 1971.

Item 2: Quality Control records indicate that on August 21 and 26, 1971 steam generator clad welding was performed at a machine amperage of 70 and 75 amps on the outlet side of steam generator No. 21, whereas the weld procedure NPT-11, specified a welding amperage range of 80-90 amps.

This apparent nonconformance to the welding procedure was a result of a defective ammeter on the welding machine in question. Con Edison and WEDCO supervision had verified that the actual output of the subject welding machine was within the procedural allowable range just prior to August 21 during welder qualification tests. The inspector, however, was unaware of the situation and, as a result, recorded in the Quality Control records the readings as indicated on the defective ammeter. Since August 26, at the request of Con Edison, all welding machines used in the repair of the steam generators have been checked for amperage by independent means two times daily to insure that the output remained within procedural limits.

Thank you for calling these matters to my attention.

Very truly yours

*William W. Lapley*