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February 10, 1977

Indian Point Station
Docket Nos. 50-247
50-286

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner

This refers to an inspection conducted by your Mr. D. Johnson on December 13 - 16, 1976 of activities authorized by NRC License Nos. DPR -26 and DPR - 64 at our Indian Point Station. Your January 20, 1977 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements. These particular activities were set forth in the Notice of Violation enclosed as Appendix A to your letter. Our response to these items of apparent non-compliance is as follows (items are identified the same as in the Notice of Violation):

- A. Changes to alarm response lists which did not appear to have been properly authorized have been removed. Temporary procedure changes have been issued where necessary. Formal revisions are being prepared and are expected to be issued by May 1, 1977. In addition, appropriate personnel have been reminded that changes to procedures must be documented and reviewed in accordance with established administrative controls.

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- B. The referenced documents were initially reviewed and approved in accordance with administrative controls in effect at the time of issuance. These procedures have recently been incorporated into SOP 10.6.3 "Containment Air Locks Operation", which is now being reviewed and which is expected to be issued by March 1, 1977.
- C. We are at a loss to understand the Inspectors allegation that procedural coverage has not been provided in the areas listed. For example, the onsite emergency power sources are covered under COL-25 (Diesel Generator - Jacket Water, Starting Air, Fuel Oil and Lube Oil) and DP-11 (Diesel Generator Manual Synchronizing). Similar procedures also exist for most of the other items listed. We recognize these procedures may not be in the form which the Inspector feels is necessary and toward this end more procedures in these areas are being written and some of the existing procedures expanded. *may not be*
- D. These superseded curves have been removed from the Graphs Book. All graphs and curves were issued in accordance with administrative control documents in existence at the time of issuance. At a meeting of the Station Nuclear Safety Committee (SNSC) on January 6, 1977, it was recommended to the Plant Manager that all future graphs and curves be submitted for SNSC approval before implementation. This recommendation was accepted by the Plant Manager. Existing graphs will also be reviewed and re-issued with SNSC approval by May 1, 1977. *Is this correct*
- E. The appropriate personnel have been reminded that changes to procedures must be documented in accordance with established administrative controls.
- F. The primary purpose of check-off lists is to assure the proper status of valves, switches, power supplies, etc. prior to placing systems or portions thereof in service. Deviations from this lineup are permissible and necessary in order to accomplish normal plant *may not be*

operations. Plant operators have been reminded that significant deviations of valves from their designated positions which may render safety related equipment inoperable must be brought to the attention of their relief and to the next higher level of authority.

Significant
Documentation

Very truly yours

