William J. Cahill, Jr.
Vice President

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February 17, 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 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner

This refers to an inspection conducted by your Mr. J. Streeter on November 16-19 and November 30-December 3, 1976, of activities authorized by NRC License Nos. DPR-26 and DPR-64 at our Indian Point Station. Your January 25, 1977 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements. These items of apparent non-compliance were set forth in the Notice of Violation which was enclosed as Appendix A to your January 25, 1977 letter.

Our specific response to each Item of Non-Compliance as set forth in the Notice of Violation follows:

Item A. 10 CFR Part 50, Appendix B, Criterion V requires in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances...."

Contrary to the above, on November 9, 1976, the reactor coolant system and Steam Generator No. 24, which had leaking tubes, were being drained simultaneously and no appropriate documented procedural controls had been established to prevent or assure the early detection of secondary to primary leakage. (Unit 2).

Response: Prior to the dilution event of November 9, 1976, Unit No. 2 had been operating with a known primary to secondary leak of minor magnitude. Based on the size of the leak, it was not considered possible that a significant exchange of water from the steam generator secondary side to the reactor coolant could occur. On this basis, it was not considered necessary to provide any special documented procedural controls for the conditions that existed at the time. Our subsequent analysis of the events of November 9, 1976, have demonstrated that our evaluation of the potential for this particular leak was correct.

However, this event did point out the potential for significant boron dilution which could occur for conditions involving a large secondary to primary leak. As a result of our review of this potential, the procedure for draining the reactor coolant system has been revised to reflect this concern. The procedure now requires that, in the event of a known steam generator tube leak, the secondary side of the steam generator be drained prior to draining the reactor coolant system. In addition, the steam generator secondary side hydrostatic pressure test procedures, that were used during the outage starting October 29, 1976, were revised prior to implementation to provide additional precautions to prevent reactor coolant boron dilution. Future steam generator hydrostatic tests will be performed using similar precautions.

Item B. 10 CFR Part 50, Appendix B, Criterion XIV, requires in part that" ... Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant ..."

Check Off Lists COL-CB-2 and COL-CB-4 are used to indicate the operating status of the Weld Channel and Containment Penetration Pressurization System and Isolation Valve Seal Water System, respectively, and require valves PCV-1110-1, -5, -9, -21, and 1404 to be locked open.

Contrary to the above, on November 19, 1976, valves PCV-1110-1, -5, -9, and -21 were open but unlocked and valve 1404 was not fully open and unlocked. Management was not aware of the abnormal operating status of these valves. Since corrective action was completed in the presence of the inspector to lock the valves open, the response to this item need only address those actions taken to prevent recurrence. (Unit 3).

Response: In order to preclude recurrence of this item, the subject valves have been added to a program which requires the periodic checking of accessible locked safeguards valves. These valves will be checked at least quarterly for correct valve alignment and locked status to assure that all such valves are as required. It is expected that the first cycle of the program will be completed by March 1, 1977.

Very truly yours,

William J. Cahill, Jr.

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