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February 6, 1978

Indian Point Station

Docket Nos. 50-247  
50-286

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

Dear Mr. Grier

This refers to Inspections 50-247/77-42 and 50-286/77-43 conducted by Mr. L. Sjostrom, Inspector, on December 19-21, 1977, of activities authorized by NRC License Nos. DPR-26 and DPR-64 at Indian Point Station. Your January 13, 1978 letter stated that it appeared that certain of our Unit No. 3 activities were not conducted in full compliance with NRC requirements and these were set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to these items of noncompliance are as follows:

ITEM A

At the time of the required calibration it was judged that an adjustment for so small a deviation (less than 1/4 of 1%) was impractical. The power range indication required to be calibrated is in 1% increments with each increment being approximately 1/16" wide. The operator would not have been able to accurately read the indicators to within 0.25%.

Since the calorimetric accuracy assumed in the FSAR is on the order of 2%, this apparent item of non-compliance in no way compromised the safe operation of the plant.

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To prevent recurrence, however, operators have been reinst-  
ructed on strict adherence to procedures, within the  
accuracy of the affected instrumentation.

ITEM B

During plant shutdown for turbine repair, manual contain-  
ment isolation valves for auxiliary steam and condensate  
UH-37 and UH-38 had been opened to maintain temperature  
within containment. This was allowed by SOP-CB-1  
(Containment Integrity). However, they were inadvertently  
left open when steam heating was no longer required to  
maintain containment ambient conditions.

Upon discovery of this condition, the valves in question  
were returned to their proper position.

To prevent recurrence of this situation, SOP-CB-1 will be  
revised by March 1, 1978, to have the shift supervisor  
enter into his log book any valves that are not in the  
positions specified by this procedure. This will highlight  
the status of these valves to the Operations Staff and  
insure that these valves are in the position required for  
a particular mode of operation. In addition, the Contain-  
ment Integrity Procedure (SOP-CB-1) will be performed at  
least once per calendar quarter to insure that all valves  
addressed in the procedure are correctly positioned.

Very truly yours

A handwritten signature in cursive script, appearing to read "William J. Keenan".

jnc