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January 16, 1978

Indian Point Station
Docket No. 50-247

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 Inspection No. 50-247/77-35, conducted by Mr. G. Napuda, Reactor Inspector, on October 31 and November 1 and 14-18, 1977 of activities authorized by NRC License No. DPR-26 at our Indian Point Station. Your December 21, 1977 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements. These activities were set forth in the Notice of Violation enclosed as Appendix A to your letter.

Our response to each item of Non-Compliance as given in the Notice of Violation is as follows:

Item A

Technical Specification 4.6.C.4 requires that once a year the batteries be subjected to a load test and a visual inspection of the plates. A precise 12-month interval was never intended by the Technical Specifications because it is necessary that these tests be performed during a cold shutdown. We have interpreted this provision as requiring a 12 \pm 6 months testing interval. This particular frequency was consistent with the frequencies for equipment tests shown in Table 4.1-3 and the intervals permitted in Table 4.1-2 for sampling tests where sampling

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is required on a weekly, monthly, etc. basis. The inspection reports' reference to the dictionary definition of "once a year" does not dispose of this problem because a dictionary definition may be met by inspections on January 1 of one year and December 31 of the following year, resulting in a two-year interval between inspections which we do not believe was intended by the Technical Specifications.

All of the battery tests conducted to date, with the exception of the one plate visual inspection noted by the Inspector, have been within the 12+6 month frequency. However, to clarify the issue and thereby prevent a recurrence of this item, we have initiated a proposed change to the Technical Specifications which will require a load test and visual inspection of the battery plates at an interval of each refueling. Until such time that the proposed change is approved by the Commission, we will conduct the battery tests once each calendar year.

Item B

The re-inking of charts and recorders is one of the routine duties of the reactor operator. Should a chart-recorder require more than routine care for proper functioning, a Maintenance Work Request is issued to the I&C Repair Subsection for maintenance on the malfunctioning equipment. At the time of the subject inspection, the charts in question required parts which were on order, and had not yet arrived. These included new pens, springs and control wire. Upon their receipt, the parts were installed and the charts are now functioning properly.

Malfunctioning recorders are infrequent. A lack of spare parts, however, caused the condition detailed by your Inspector. The necessary spare pens, springs and control wire have been obtained to maintain the required charts/recorders in working order. This will preclude recurrence of the condition reported in the subject inspection report.

Item C

A written procedure for the retention of recorder chart records is in the process of being reviewed, and will be in effect by February 1, 1978. This procedure will comply with Technical Specification 6.8.1 and Appendix A of USNRC Regulatory Guide 1.33. Implementation of the above-mentioned procedure will prevent recurrence of this item.

Item D

At times, material received by our warehouse is shipped without the required plugs and/or caps used to seal openings and/or protect threads and weld end preparations. Frequently these plugs and/or caps become dislodged during shipment and are not replaced. Additional plugs/caps are being obtained in all required sizes to supplement those already on hand for the protection of stainless steel piping and tube sections.

To prevent recurrence of this item, regular inspections, on a weekly basis, will be made, and any missing plugs/caps will be replaced immediately.

Item E

Following discussions with your Inspector, a review of the MWR work package for the installation of ECCS current limiting devices was performed by the Test Engineer. It was determined that no retest requirement beyond the normal return to service test was required, due to the nature of the modification.

To prevent recurrence of problems of this nature, Generation Facilities have implemented "Construction Field Directive No. 8", which clarifies the required interface between Generation Facilities personnel and the Test Engineer on all Generation Facilities managed MWR work packages.

Very truly yours

