

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

October 28, 1977

Indian Point Station  
Docket No. 50-247

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 Inspection No. 50-247/77-30 conducted by Mr. J. Higgins, Reactor Inspector, on September 13-15, 1977, of activities authorized by NRC License No. DPR-26 at our Indian Point Station. Your October 5, 1977 letter indicated that one of our activities was not conducted in full compliance with NRC requirements. This activity was set forth in the Notice of Violation enclosed as Appendix A to your letter. Our response to this item is as follows:

This event resulted from a misunderstanding of the extent to which the containment integrated leak rate test procedure embodied the performance of local leak rate tests. This test procedure required that, following repairs to correct leakage paths, a local leak rate test be performed. The subject valves were tested, following repair, using the general guidance for local leak rate testing as provided by this procedure.

To prevent recurrence of this item, responsible personnel have been instructed that testing following repairs to valves in Class A systems is not included in the containment integrated leak rate test procedure but rather requires individual written retest procedures.

Very truly yours,



8111240330 771110  
PDR ADOCK 05000247  
G PDR