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April 1, 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 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner

This refers to Inspection No. 50-247/77-03, conducted by your Mr. J.C. Higgins on February 7-10, 1977 of activities authorized by NRC License No. DPR-26 at our Indian Point Station. Your March 9, 1977 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements. This particular activity was set forth in the Notice of Violation enclosed as Appendix A to your letter. Our response to this item of apparent non-compliance is as follows:

1. During performance of periodic surveillance test PT-R27 "Containment Isolation Valves Leakage Rate Determination (Type C)", Revision 0 to this test was utilized for the first group of valves to be tested. Prior to testing the remaining valves, Revision 1 to the test was issued. This revision required, among other things, that test pressure and ambient temperature readings be recorded on each applicable data sheet. Since there was no requirement for recording pressure and temperature on each data sheet when the first group of valves were tested, no documentation existed on the 24 data sheets relating to these valves when the completed test package was reviewed by the Inspector. Conservative values of these parameters were used where appropriate when evaluating the test results.

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2. PT-R26 "Isolation Valve Seal Water System Test" was developed from the start-up test procedure for this system. The requirement that a copy of UE&C Flow Diagram - 9321-F-2746 be used to document completion of Prerequisite 4.3 was a "carryover" from that original procedure. When the surveillance test was developed it was recognized that there was no need for a copy of the flow diagram to be a part of the test, however it was not deleted. The test that was conducted during the refueling outage did not utilize this flow diagram and a revision to the test procedure to eliminate the requirement and any reference to the flow diagram has been issued.

In order to reduce the probability of further items of non-compliance of this nature, responsible personnel have been cautioned to exercise more diligence in the preparation of test procedures. In addition, when appropriate, procedure changes to surveillance tests already in progress will be effected by authorized temporary procedure change forms to preclude making formal revisions during the performance of the tests.

Very truly yours

A handwritten signature in cursive script, appearing to read "William J. Hill, Sr.", is written in dark ink. The signature is fluid and somewhat stylized, with a prominent initial 'W' and a long, sweeping tail.