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Assistant Vice President

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Letter No. 81-35

February 23, 1981

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Eldon J. Brunner, Chief
Reactor Operating and Support Branch
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

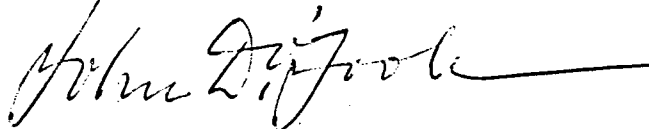
Dear Mr. Brunner:

This refers to Inspection 50-247/80-22, conducted by Mr. W. Baunack, Acting Senior Resident Inspector, on December 1-19, 1980, of activities authorized by NRC License No. DPR-26 at Indian Point Station. Your January 27, 1981 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed therewith as Appendix A. We admit to these items of non-compliance and our response is presented in Attachment A to this letter.

Your letter also asked that we address those actions taken or planned to improve the effectiveness of our management control systems. Our actions taken in regard to this concern are provided in Attachment B to this letter.

This response is being provided pursuant to Section 182 of the Atomic Energy Act of 1954, as amended. Should you or your staff have any questions, please contact us.

Very truly yours,



Subscribed and sworn to
before me this 23rd day
of February, 1981.



Notary Public

ANGELA ROBERTI
Notary Public, State of New York
No. 41-8593813
Qualified in Queens County
Commission Expires March 30, 1982

cc: Mr. T. Rebelowski, Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

Response to Insp. Report
80-22 violations

ATTACHMENT A

Items A, B and C

Response:

The root cause for Item A, B and C is identical thus they will be discussed together. These items resulted from the fact that the defective handwheels/reach rods associated with the residual heat removal pump suction and discharge valves, although identified by Maintenance Work Requests, have not been promptly repaired.

As stated by your inspector, the subject handwheels/reach rods have been repaired. In order to prevent recurrence, as stated in item C of Attachment B to this letter, the existing maintenance work request process has been reviewed and changes to improve the process will be implemented prior to returning the plant to service. In addition, appropriate personnel have been reinstructed in the requirements of Station Administrative Order 104, Maintenance Work Request Procedure, and in the necessity to adhere to these requirements.

Item D

Response:

This item resulted from the fact that a program did not exist which adequately delineated and tracked station housekeeping inspections.

To prevent recurrence, the Plant Manager has instituted a program whereby, on a weekly basis, his staff notifies the responsible individual of the required inspection. The staff also verifies that a completed report is submitted for each scheduled inspection. In addition, at a meeting of the Station Nuclear Safety Committee, the Committee reviews the requirement and need for weekly housekeeping inspections of the station. This requirement was further emphasized in a memorandum from the Plant Manager to all Emergency Duty Personnel.

In order to provide further assurance of proper station housekeeping, as stated in items A and F of Attachment B to this letter, a complete plant inspection and a review of station housekeeping policy have been completed. Action to correct identified housekeeping items is being taken and individual subsection heads have been assigned to specific plant areas to assure the effectiveness of this housekeeping policy.

ATTACHMENT B

The following actions have been taken or are planned to further improve our Management Control Systems:

A - Plant Inspection

Inspections encompassing the entire plant were conducted over the period of December 17, 1980 to January 3, 1981 by the Chief Operations Engineer, Plant Manager, and Manager of NPG. The purpose of these inspections was to determine if plant safety items existed and additionally to view the total housekeeping effort.

The inspections did not identify any plant safety issue but did identify housekeeping matters that require correction. The housekeeping matters identified have been assigned to personnel for correction. Copies of the detailed findings of inspection results are available for review. Work to correct these items has started and the Plant Manager is following up. It is also recognized that housekeeping is dynamic and these inspections do not constitute a one time effort. With the outage in progress the situation is more dynamic but controllable, and continuous attention to these matters is addressed in many forums, e.g. the daily outage meeting, plant tours by management, speaking with workers, etc.

Housekeeping has been addressed by a Station Administrative Order, specifically SAO-116. The order is clear in its intent. The assure it is being carried forward, specific area assignments have been made.

B - Locked Valve Audit

On December 16th and December 17th, 1980 an audit of locked valves on COL-51 was performed. The purpose of this audit was to verify that all locked valves are in the proper position and capable of being locked.

This audit revealed that no valve required to be locked under present plant condition was found unlocked.

A number of areas where improvement may be made were identified. These items will be accomplished and a second locked valve audit will be performed prior to the plant's return to service.

C - Maintenance Work Request Process Review

A review of the Maintenance Work Request (MWR) Program was completed on January 5, 1981. Detailed recommendations were developed addressing improvements in MWR followup, timely work completion and interactions between MWR's and other relevant plant documents. These recommendations

are under review and appropriate changes will be incorporated into the MWR process prior to returning the plant to service.

D - Surveillance Test Process Review

The Surveillance Test Process Review was completed on January 5, 1981. Recommendations for improvement included additional followup of Surveillance Test findings and closer connections with the MWR process. Followup additional review, appropriate changes to the Surveillance Test Process will be made prior to returning the plant to service.

E - Personnel Safety Concerns

An Administrative Policy, SAO-123, which addresses Personnel Safety Concerns has been implemented. This document provides an individual having a concern about nuclear safety with an avenue for expressing this concern to the appropriate level of management for resolution or action if necessary. This concern may be broad nature or may be plant specific such as identification of procedural problems.

F - Station Housekeeping Policy Review

A review of the Station Housekeeping Administrative Directive, SAO-116, was completed on December 31, 1980. This review indicated that the directive was adequate. However, to improve its effectiveness, individual subsection heads have been assigned responsibility for specific areas of the plant.

G - Plant Supervision Training Program

A training course for Plant Supervision and a program for implementation of this training have been established. This training course includes an overview of equipment requirements, safety, housekeeping, goal setting, communication and procedure usage. It is expected that training will start on May 4, 1981.