

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-2533

Letter No. 81-49

March 12, 1981

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

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
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 50-247/81-01, conducted by Mr. W. Troskoski, Reactor Inspector, on January 5-9, 1981 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your February 12, 1981 letter stated that it appeared one of our activities was not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to this item of non-compliance is presented in Attachment A to this letter.

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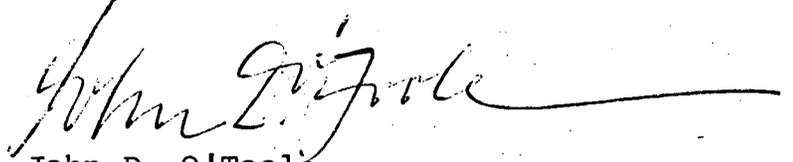
Mr. Eldon J. Brunner
Chief

-2-

March 12, 1981

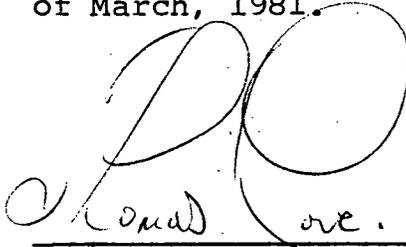
Our response is being submitted at this time as discussed with Mr. T. Rebelowski, NRC Resident Inspector for Indian Point, and is being provided pursuant to Section 182 of the Atomic Energy Act of 1954 as amended. Should you or your staff have any questions, please contact us.

Very truly yours



John D. O'Toole
Vice President

Subscribed and sworn to
before me this 12 day
of March, 1981.



~~Notary Public~~
Notary Public State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1981

attach.

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

March 12, 1981

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ATTACHMENT A

Response:

This item occurred because the subject procedure did not specifically identify the source of the "old base count" value to be used in base count recalculation, thus leading to a data translation error.

As stated by your inspector, the subject calculation resulted in a conservative base line value for inverse count rate ratio monitoring.

In order to prevent recurrence of this item, the subject procedure has been revised to provide additional guidance to the individual performing the base count recalculation. Specifically, the base line count rate calculation sheet now includes clear identification of those values to be used for "old base count" in performing subsequent calculations.

In addition, to further preclude the possibility of an undetected error in the base count, the calculation sheet now requires a second base count determination. This second calculation is performed by a different individual and verifies the determined base count.