

Murray Selman
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Ave.
Buchanan, NY 10511
Telephone (914) 737-8116

September 26, 1985

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

Mr. Samuel J. Collins
Chief, Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Collins:

This refers to routine inspection 50-247/85-18 conducted by Mr. L. Rossbach of your office on July 1-31, 1985 at Indian Point Nuclear Generating Station, Unit 2, Buchanan, New York of activities authorized by NRC License No. DPR-26.

Your August 26, 1985 letter stated that it appeared that 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. Pursuant to the provisions of 10 CFR 2.201 our response to the notice is presented in Attachment A to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



Attachment

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

15.191.9.24.2

8510040123 850926
PDR ADDOCK 05000247
G PDR

11 1E 01

September 26, 1985

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

ATTACHMENT A

VIOLATION

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33. Section 1.c of Appendix A to Regulatory Guide 1.33 includes procedures addressing equipment control and tagging. Section 1.d of Appendix A to Regulatory Guide 1.33 includes procedures addressing procedure adherence. Administrative Directive OAD-19, Revision 2, "Tag-Out Log," requires specific licensee tag-out log keeping techniques. Station Administrative Order SAO-215, Revision 0, "Identification of Valves," requires a program to ensure that all valves are uniquely identified in accordance with the guidelines of the procedure. Station Administrative Order SAO-122, Revision 3, "Drawing Control," requires that a copy of the Special Drawing Index be located in the Central Control Room.

Contrary to the above, in July 1985, the inspector identified the following:

- (a) Caution tags (with jumper identification numbers) for valves SWN-51-1 through 5 were found on motor control center 26BB. These tags were not logged in the caution tag log.
- (b) Service water valves SWN 38, SWN 39, and the SWN 41's were not tagged and uniquely identified.
- (c) The latest Special Drawing Index, dated March 28, 1985, was not posted in the control room.

This is a Severity Level V Violation. (Supplement 1)

RESPONSE

- (a) Caution tags for valves SWN-51-1 through 5 were reissued and properly logged in the caution tag log promptly after the Resident notified us. A copy of this violation notice has been distributed for reading by all Operations personnel.

September 26, 1985

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

- (b) Station Administrative Order (SAO) 215, entitled "Identification of Valves", states that:

"The Operations Manager shall implement a program to ensure all Indian Point Unit 2 valves are uniquely identified.."

The identified condition is not in violation of this SAO. This program was implemented and has proven very successful. The program insures missing tags are identified and, if missing, ordered. The tags in question have been previously identified as missing and were listed to be reordered along with a number of other valve tags. We are in full compliance with this SAO and the process of ensuring valves are uniquely identified and tagged is an ongoing one.

- (c) The latest index was posted promptly after the Resident notified us. The verification of the CCR Drawing Index will be performed on a monthly basis. A copy of this violation notice has been distributed for reading by all Operations personnel.