Murray Selman
Vice President

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

January 29, 1986

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

Mr. Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Martin:

This refers to I.E. Inspection 50-247/85-31 conducted by Messrs. J. White and A. Weadock of your office, during ~~the~~ week of December 16, 1985 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. This inspection covered Con Edison's licensed program relative to radiological controls.

Your January 10, 1986 letter, which served to transmit the inspection report, stated that while no violations were identified, the inspectors detected an apparent weakness in the implementation of the training program applied to contractor health physics technicians. Furthermore, your office requested a response from Con Edison within 15 days of receipt of that letter.

Consolidated Edison's response to the inspection report is forwarded herewith as Attachment A. If you or your staff have any questions regarding the station's radiation protection activities, please contact me.

Very truly yours,

Murray Selman

Attachment
16.191.1.22.1
cc: Mr. James Taylor, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Ronald R. Bellamy
Chief, Emergency Preparedness and
Radiological Protection Branch
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, NY 10511

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ATTACHMENT A

Consolidated Edison's response to each licensee action item set forth in Inspection Report No. 50-247/85-31 is given below. The actions taken address the training of contractor Health Physics technicians for the 1986 refueling outage.

Training

1. Formalized and approved lesson plans would be established by which the training program would be implemented.

   Response: Formalized lesson plans were developed for both the junior and senior technician positions. Each lesson plan was approved by the Radiation Protection Manager and the Manager, Nuclear Training. This was completed and implemented for the contractor training class commencing December 30, 1985.

2. The performance testing would be upgraded to provide for a challenging examination of student comprehension and ability by which to evaluate the effectiveness of the student and the training program.

   Response: Separate tests were written for Junior and Senior Technicians. Both the pre-tests and the final tests were expanded and rewritten, prior to the December 30th class, to make the examinations more challenging.

3. Management control and oversight will be immediately enhanced to assure that the quality of the training program is maintained.

   EH&S management and Training Section supervisors have become and will continue to be closely involved with the preparation of lesson plans, tests, oral examinations and on-the-job training.

   Response: EH&S management and Training Section supervisors have become and will continue to be closely involved with the preparation of lesson plans, tests, oral examinations and on-the-job training. Additionally, management control and oversight were further enhanced by rescheduling the 3 - 11 classes to the 7 - 3 shift. Where this was not feasible, a Con Edison management employee was assigned to oversee the contractor classes offered off-shift.

4. Additional technical and clerical personnel will be assigned as necessary to this training program to support development and establishment.

   Response: The following additional personnel were assigned to develop and implement the lesson plans.

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Additional technical support was provided by:

Three Health Physics Technicians acting as instructors

Three Health Physics Instructors

Training Administrator

Training Department Manager

Radiation Protection Manager

Additional clerical support was provided by two typists dedicated to the lesson plan development by the Nuclear Training Manager.

5. The on-the-job training (OJT) portion of the training program will be formalized and incorporated into procedures. Additionally, since there is concern about the quality of the first training session, the group will be particularly evaluated during OJT to determine if retraining is necessary.

Response: Qualification Cards were developed and incorporated into EH&S procedure 2.003 for Junior and Senior contract Health Physics technicians. Technicians were trained and evaluated using practical factor exercises in simulated radiation areas on the secondary side of the plant, walk-throughs of the plant, reviewing the Steam Generator mock-up and interviews with management personnel in the Health Physics section. The HP technicians associated with the Steam Generator attended a two day training course on the SM10W robot being used for the maintenance work. A practical factors class will also be conducted approximately February 5,6 and 7 for the entire Steam Generator crew to rehearse the task.

The test results of the technicians who attended the first training class were reviewed. The first class consisted of four Senior Technicians and fourteen Junior Technicians. Of these, one Senior and one Junior Technician were released. Replacements were requested from the vendor. One additional Senior and Junior Technician were sent back for re-training during the December 30th class. These two successfully passed the training course.

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