

**Murray Selman**  
Vice President

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

May 16, 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 the meeting at your office on March 20, 1986. The meeting was held to review routine inspection 50-247/86-01 conducted by Mr. P. Clemons of your office on January 6-10, 1986 at Indian Point Nuclear Generating Station, Unit 2.

Your April 16, 1986 letter following the meeting stated that it appeared that certain deficiencies existed in one of our activities, and that your concerns were 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

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ATTACHMENT A

Response to Notice of Violation

VIOLATION

The establishment and execution of the required quality assurance program was inadequate as itemized below.

1. The quality control responsibilities of the Environmental Health and Safety personnel who are responsible for the shipment of radioactive material was not adequately specified.
2. The Environmental Health and Safety personnel were not trained in the responsibilities for quality control.
3. The implementing procedures did not adequately discuss the role of Environmental Health and Safety personnel in quality control.

This is a Severity Level IV violation (Supplement V).

Response

Con Edison Corporate Instructions (CI's) are the company's highest tier procedures. CI-240-1 defines the responsibilities of the Quality Control program including the shipment of radioactive material and the responsibilities of Environmental Health and Safety (EH&S) personnel for this activity. These responsibilities are further defined as specific activities in the lower tier implementing procedures. Although these Quality Control activities were defined and being performed, the implementing procedures did not adequately define them as "Quality Control" steps. Accordingly, their identification as "Quality Control" steps was inadequately communicated to the personnel carrying them out.

Environmental Health and Safety personnel have been instructed in their responsibilities according to Corporate Instruction, CI-240-1 Supplement I. They have also been instructed that the inspections and verifications they have been performing are indeed Quality Control activities. The management position guides of all Radwaste personnel have been clarified to include Quality Control requirements. Implementing procedure EHS-SQ-4.003, Radwaste Section Duties and Responsibilities, was revised May 1, 1986 to include CI-240-1 Supplement 1 requirements and to clearly define them as "Quality Control" steps.

Quality Assurance and Reliability will also assure increased awareness of the QA program responsibilities assigned to each organization.

In addition to the actions described above, which are in direct response to the Notice of Violation, we are taking or have taken the following actions:

- As of May 1, 1986 the following five implementing procedures have been revised to include QA/QC documentation of Nuclear Power Quality Assurance (NPQA) participation in waste processing, receipt inspection of waste packaging containers, dewatering and solidification.

EHS-SQ-4.000 - Shipment Final QA Inspection

EHS-SQ-4.200 - CNSI System

EHS-SQ-4.303 - Shipping Cask Handling Procedure

EHS-SQ-4.704 - Removal and solidification of Plant Filters

EHS-SQ-4.007 - Process Control Program

Three additional Radwaste procedures have since been revised.

EHS-Q-4.201 - Replacement and Dewatering of Filters

EHS-Q-4.103 - 10CFR Part 61 Radwaste Classification

EHS-SQ-4.010 - WASTETRAK Operations

The remaining procedures associated with the Quality Control Program for the shipment of radioactive materials will be reviewed by Radwaste and NPQA and revised as necessary by July 31, 1986.

- In cases in which there are peer or supervisory inspections, NPQA will communicate to these personnel the inspection philosophy and regulatory nature of these inspections.