

**Murray Selman**  
Vice President

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August 13, 1986

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

Mr. Samuel J. Collins, Chief  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

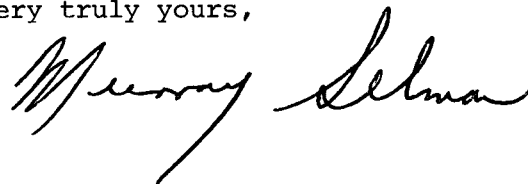
Dear Mr. Collins:

This refers to inspection 50-247/86-15 conducted by Mr. Lawrence W. Rossbach and Mr. Peter W. Kelley of your office on June 10, 1986 to July 7, 1986 at Indian Point Nuclear Generating Station, Unit 2.

Your July 14, 1986 letter stated that it appears 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 10CFR 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,



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 NRC INSPECTION 86-08

VIOLATION A

Technical Specification 3.12.1 requires that during all modes of operation except cold shutdown and refueling, all snubbers listed in Table 3.12-1 shall be operable. Operability is defined as the ability of the snubber to perform its required function.

Technical Specification 3.12.4 requires that if a snubber is determined to be inoperable while the reactor is in the cold shutdown or refueling mode, the snubber shall be made operable or replaced prior to bringing the reactor above cold shutdown.

Contrary to the above, seismic restraint SR-1092 was made inoperable when it was disconnected on May 13, 1986, while the unit was in cold shutdown. On May 18, 1986 at 10:35 a.m., the unit was brought out of cold shutdown with the seismic restraint disconnected. The condition was discovered on May 20, 1986 and the seismic restraint connected.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

On May 13, 1986 Indian Point Unit 2 was at cold shutdown for maintenance. Seal overhaul was required on No. 24 Reactor Coolant Pump (RCP). Seismic Restraint SR-1092 was removed from line number 74 by maintenance support personnel to facilitate removal of the RCP motor and motor stool. Line number 74 is a one-inch seal leak-off line from the number 2 seal of RCP No. 24 to the Reactor Coolant Drain Tank via line number 84.

Station maintenance personnel reinstalled the motor and seal auxiliary line, including line number 74.

The maintenance procedure for performing RCP seal overhauls is sufficiently generic to permit its use on any of the four RCP's, although the installed configuration of the RCP's, including auxiliary piping, is not identical at each pump. In particular, only seal overhaul of No. 24 RCP requires removal and reinstallation of a seismic restraint. These requirements were not included in the procedure.

The Station maintenance supervisor for this particular overhaul did not know that SR-1092 had been removed by maintenance support personnel and subsequently, during reinstallation, did not direct that it be reinstalled.

On May 18, 1986 at 1035 hours the unit was brought above cold shutdown. On May 20, 1986 personnel performing balancing on No. 24 RCP observed that SR-1092 was disconnected and promptly reported this to Operations. SR-1092 was promptly reconnected, inspected and left operable.

To prevent recurrence, the maintenance procedure for overhaul of RCP seals will be enhanced to include a "note" that SR-1092 on No. 24 RCP may have to be removed prior to removing the motor. A maintenance quality control check after reassembly will also be included to verify that seismic restraints are secured.

This procedure will be revised by September 1, 1986.

Date of full compliance: May 20, 1986