

**Murray Selman**  
Vice President

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

December 19, 1986

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 inspection 50-247/86-27 conducted by Mr. L. Rossbach and P. Kelley of your office on September 16, 1986 to October 13, 1986 at Indian Point Nuclear Generating Station, Unit 2.

Your November 19, 1986 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.

In addition to the above referenced response, Attachment B reviews our corrective actions to ameliorate the situation.

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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Re: Indian Point Unit No. 2  
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ATTACHMENT A

Response To Notice of Violation

Violation A:

Technical Specification 6.8.1 requires that written procedures be implemented as recommended by Regulatory Guide 1.33, Appendix A, (November 1972)

Appendix A of Regulatory Guide 1.33 (November 1972) requires procedures for startup, operation and shutdown of safety related systems including emergency power sources.

Operations Administrative Directive 6, Rev. 6, states that equipment status documentation can be in the form of completed checkoff lists, current tag-outs, status boards, current shift turnover checklist or procedures currently in use.

Contrary to the above, on October 9, 1986, the emergency diesel generators were not lined up in accordance with checkoff list 27.4, Rev. 1 or 27.3.1, Rev. 1 with Temporary Procedure Change TPC-067, nor was this equipment status otherwise controlled by tag-outs, status boards, checklists or procedures in the following three examples:

- a) All three fuel oil storage tanks were aligned to the emergency transfer header (instead of two to the normal and one to the emergency header)
- b) Starting air system air tank equalizing line stop valves, DA-2 and DA-2-1 were open (instead of being closed); and,
- c) Starting air tank No. 22 receiver outlet valves, DA-9-1 and DA-10-1 were closed (instead of being open).

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

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Response:

The above listed violation resulted from a non-compliance with Operations Administrative Directive - 6 which requires that equipment status documentation be in the form of completed check-off lists, current tag-outs, status boards, current shift turnover check-off lists or procedures currently in use.

The violation concerned work performed under an "Area Work Permit". Unless specified, Area Work Permits have not, in general, required special valve lineups and no tag-out was performed. Upon job completion, the Area Work Permit was cleared without restoration of the system line-up. Required valve position status was not documented by another method prior to NRC inspection. The procedure for tag-outs and documentation of system line-ups for all conditions is being revised to clarify documentation requirements on any deviations made.

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ATTACHMENT B

Corrective Action:

To clarify the requirement that deviations from required valve line-ups must be documented, a change to OAD-19 (Caution Tag & Tag-Out Program) was issued to specify that the "as left" condition following work performed under an Area Mark Permit shall conform to appropriate check-off lists and that a tag-out form shall be completed. This change, which went into effect on November 5, 1986, is expected to enhance supervisory control over valve and component manipulation.

A comprehensive revision of OAD-19 is being prepared which will further define requirements for tag-outs and documentation of system line-ups for all conditions. This revision is currently undergoing management review and is expected to be issued by January 31, 1987.