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Vice President

Consolidated Edison Company of New York, Inc.  
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March 31, 1987

Mr. Robert M. Gallo, Chief  
Projects Branch No. 2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Re: Consolidated Edison Company of New York, Inc.  
Indian Point Station Unit No. 2  
Docket No. 50-247

Dear Mr. Gallo:

This is in response to your letter of March 2, 1987 concerning routine inspection No. 50-247/87-01 conducted by Mr. Lawrence W. Rossbach and Mr. Peter W. Kelley on January 6, 1987 to February 2, 1987 at Indian Point Unit No. 2.

In general we acknowledge that the procedures and practices then in effect permitted the observations noted in your March 2, 1987 letter. The circumstances related to the noted violation, together with our corrective action and date of implementation to preclude recurrence, are stated in Attachment A to this letter.

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

Very truly yours,



19.190.3.12.1  
Attachment

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Dr. Thomas E. Murley  
Regional Administrator - Region I  
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Attachment A

Response to Notice of Violation

Violation

- A. 10 CFR 50, Appendix B, Criterion XI requires, in part, that a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied.

Technical Specification 6.8.1.a requires, in part, that the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972 shall be established, implemented, and maintained. Section 5.3.5 (1) of ANSI N18.7-1972 states, in part, instructions shall be included, or referenced, for returning equipment to its normal operating status. Operating personnel shall place the equipment in operation and verify and document its functional acceptability.

Contrary to the above, as of January 29, 1987, no post-maintenance (modification) test was performed that verified and documented the functional acceptability of differential pressure instruments FIC 1136 and DPC 1134S in the Emergency Diesel Generator Water System. The instruments were relocated during the 1986 refueling outage per Modification 85-20836-02.

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

Response

Consolidated Edison acknowledges that no post-maintenance (modification) test was performed verifying the operability of differential pressure instruments FIC 1136 and DPC 1134S in the Service Water Sub-System to the Emergency Diesel Generators. The cause of this oversight is due to the fact that this change constituted a partial modification and that no notice of installation had been issued after job completion. A post modification test procedure was issued but never implemented due to the lack of notification.

In the response to Routine Inspection No. 50-247/86-28, Consolidated Edison committed to revising Station Administrative Order 405, "Modifications to Indian Point Facilities" as a result of a similar incident. Both the previous event, as well as the current one, arose due to a procedural omission. The procedure has been revised and is undergoing final review

with expected issuance by the commitment date of March 31, 1987. The new revision clearly defines the requirement for a Notice of Installation to be issued upon completion of a partial modification.

In addition, in order to effect more control over post maintenance testing, Station Administrative Order 204, "Work Order Procedure" is undergoing evaluation for revision. Thus all plant changes, whether by the process of formal plant modification or through normal plant maintenance, will be procedurally enhanced with respect to post implementation testing prior to return to service.