

**Murray Selman**  
Vice President

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Indian Point Station  
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April 10, 1987

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

Mr. William V. Johnston, Acting Director  
Division of Reactor Safety - Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

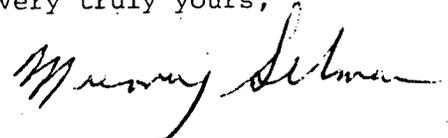
Dear Mr. Johnston:

This refers to inspection 50-247/87-02 conducted by Mr. A. Finkel of your office on January 27-29, 1987 at Indian Point Nuclear Generating Station Unit 2.

Your March 11, 1987 letter stated that it appears that certain of our activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed therewith as Appendix A. While we acknowledge that the procedures and practices in effect at the time of inspection permitted the observations noted in your March 11, 1987 letter regarding battery 21 capability, our subsequent study has determined that the batteries were indeed capable of supplying their design load at the electrolyte temperatures observed on January 27-29, 1987. 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  
20.190.4.7.2

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

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Regional Administrator - Region I  
U.S. Nuclear Regulatory Commission  
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

Response to NRC Inspection Report 50-247/87-02

Violation

10 CFR 50, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test procedures shall include provisions for assuring that the test is performed under suitable environmental conditions.

The Indian Point Unit 2 Quality Assurance Program and American National Standard N18.7-1976/ANS-3.2, Section 5.2.8 require that a surveillance testing and inspection program be prescribed to ensure that safety-related structures, systems and components continue to operate, keeping parameters within normal bounds.

Contrary to the above as of January 28, 1987, the licensee's surveillance and test procedures were inadequate to demonstrate and ensure the operability of station DC battery system in that:

1. The licensee failed to include requirements and acceptance limits for battery electrolyte temperature and the resulting effects on capacity. (A low electrolyte temperature of 54°F was subsequently determined by the licensee to make the No. 21 battery inoperable and require the initiation of a plant shutdown on January 29, 1987), and
2. The licensee's monitoring and surveillance procedures, including the station freeze protection procedure, do not include the battery room (at elevation +33.0 in control building) in the winterizing program; thus, they do not ensure that suitable environmental conditions are kept within normal bounds for safety related equipment to be operable.

This is a Severity Level IV violation (supplement I).

Response

- 1) The following near term corrective actions were taken on an immediate basis:
  - a) Cable spreading room heaters were energized to raise the ambient temperature.
  - b) Interim values of minimum battery cell temperature were established, and periodic measurement (every 4 hours) of the room temperature was initiated.
- 2) In addition to the above corrective action, the following steps are being taken to prevent future occurrence of a similar event:
  - a) A review of the capabilities of the batteries to operate at various electrolyte temperature was initiated to determine the operating limits. It has now been established that the batteries were capable of supplying their design load at the electrolyte temperatures observed on January 29, 1987. Thus, Battery No. 21 was in fact really inoperable.
  - b) A study of the battery room HVAC system and the temperature requirements of the safety related equipment located in the area is in progress. This will verify if the system is working as intended and if any modifications to the system or revisions to the station Freeze Protection Procedure are necessary to maintain the limiting temperature.
  - c) A review of the Station Test and Performance Battery Procedures to assure the adequacy of these procedures in monitoring the parameters was also initiated.
- 3) Results of the above studies and reviews are expected to be formulated by April 30, 1987. A detailed implementation schedule will be established based on the findings of these studies.

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