

**Murray Selman**  
Vice President

Consolidated Edison Company of New York, Inc.  
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Buchanan, NY 10511  
Telephone (914) 737-8116

May 6, 1987

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

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

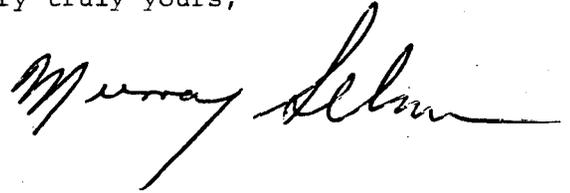
Dear Mr. Johnston:

This refers to the routine safety inspection conducted by Mr. N. Blumberg of your office during February 23-27, 1987 at Indian Point Nuclear Generating Station, Unit No. 2.

Your April 8, 1987 letter, which transmitted Inspection report No. 50-247/-87-06, stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements, set forth in the Notice of Violation, enclosed therewith as Appendix A. Pursuant to the provisions of 10 CFR 2.201, our response to that notice is presented in Attachment A to this letter.

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

Very truly yours,



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Attachment

cc: Mr. William Russell  
Regional Administrator - Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

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May 6, 1987

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

Attachment A

Response to Notice of Violation

Violation A:

10 CFR 50, Criterion XVI, requires that identified deficiencies and deviations be promptly corrected and that corrective action be taken to preclude repetition. Consolidated Edison Quality Assurance Manual, CI-240-1, Section XIII requires that deficiencies adverse to quality be corrected and appropriate action taken to preclude recurrence. Procedure SAO-218, "Housekeeping Policy," requires that compressed gas cylinders be capped and secured if left unattended; that temporary cable be properly insulated; and that cable trays shall not contain trash.

Contrary to the above, on February 23 and 24, 1987, housekeeping deficiencies adverse to quality previously identified in NRC Inspection No. 50-247/-86-19, (Appendix A, Violation C), issued by letter dated September 24, 1986, concerning unsecured compressed gas cylinders, and trash and debris observed at various plant locations were not promptly corrected to preclude repetition in that:

- Four compressed gas cylinders in the Primary Auxiliary Building (PAB) were improperly secured. Three bottles were secured with loose rope in such a manner that they could have easily fallen, and a fourth bottle was secured with only a thin plastic stay strap which could easily break with only limited force.
- Two gas cylinders in the PAB steam generator blowdown station and one gas cylinder in the Fuel Handling Building, were not in use, and did not have protective caps installed.
- PAB electrical penetration room cable trays contained trash in the form of one telephone, one light bulb protector cage, one coil of rope, and wiring of an indeterminate nature.
- Temporary cable runs in the PAB Fan Building and the Maintenance Outage Building had uninsulated cable ends.

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

## Response

At Indian Point Unit No. 2 overall housekeeping has improved as a result of taking substantial corrective action to close out previously identified housekeeping deficiencies. However, we acknowledge that these previous corrective actions have not been completely effective; particularly, as noted above, those concerning uncapped and improperly secured gas cylinders, trash in cable trays, and uninsulated cable ends. Subsequent to being notified of the above deficiencies the following immediate steps were taken to correct the observed deficiencies:

1. All gas cylinders not being utilized were removed from the Radiologically Controlled and Vital areas. Cylinders in use were properly secured and tagged to identify the user and type of gas.
2. The PAB electrical penetration room cable trays were inspected and cleaned, all trash was removed.
3. Temporary cable runs in the PAB Fan Building and the Maintenance Outage Building with uninsulated cable ends were removed.

Con Edison further recognizes that the above are just specific examples of the broader safety issue related to the storage of transient equipment. Heretofore, Con Edison has relied upon a general policy of good housekeeping to control temporary transient equipment. We believe the instances cited in the violation requires us to enhance our policy in this regard, and Station Administrative Order 218 is currently undergoing revision to strengthen our requirements in this regard. The revised SAO will specifically address the control of temporary scaffolding during modification implementation, the use and location of filled gas cylinders, dollies, hoists, welding machines and tools. The objective will be to exercise control over temporary construction situations including debris which could have the potential to impact safety.

SAO 218 will be totally revised by June 1, 1987. It has already been supplemented to include more specific measures for the use and control of filled gas bottles.