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Vice President

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Telephone (914) 737-8116

September 15, 1987

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

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

Subject: Revised Response to Inspection Report No. 50-247/87-01

The Attachment to this letter contains a revision to our March 31, 1987 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 observation was valid and that procedures and practices in place at the time, as well as now, should have precluded the occurrence.

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

Very truly yours,

*John A. Basile*

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

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 38  
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Attachment A

Response to Notice of Violation

Violation

- A. 10CFR50, 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 (PMT) 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. Following installation of the instruments, it had been determined that there existed a high likelihood that the modification would not accomplish the desired function and so the PMT was not performed. A revised modification was requested and the system was placed in the incident mode to insure the required Service Water flow in the event of an accident. The redesigned modification has been prepared and approved and is scheduled for installation in the first outage of sufficient duration following material availability. A PMT will be conducted on this modification upon its installation.

The conscious decision not to perform the PMT should have been documented upon the determination of the need for a redesigned modification and the placement of the system in the incident mode.

Consolidated Edison recognizes the requirements and importance of complete documentation and this has been reemphasized in formal training in SAO 405, "Modifications to Indian Point Facilities." This training of relevant personnel will commence on September 21, 1987. We plan to make this course part of the Technical Staff and Manager Training Program.