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Vice President

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October 30, 1987

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

Mr. William F. Kane, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Subject: Revised Response to Routine Inspection No. 50-247/86-28,
Violation A

Dear Mr. Kane:

This is a partially revised response to your letter of January 5, 1987 concerning routine inspection No. 50-247/86-28 conducted by Mr. Lawrence W. Rossbach and Mr. Peter W. Kelley on October 14, 1986 to November 21, 1986 at Indian Point Unit 2. The original response to the Inspection Report was submitted by letter dated February 4, 1987.

The attachment to this letter constitutes a revision to our response to Violation A of your Inspection Report and has been prepared to document specific actions that we have taken since the original response was submitted. Changes have been noted by the use of marginal change bars.

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

Very truly yours,



25.190.10.28.1

cc: Ms. Marylee M. Slosson
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Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
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Re: Indian Point Unit No. 2
Docket No. 50-247

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. These results shall be documented and evaluated to assure that test requirements have been satisfied.

The Consolidated Edison Quality Assurance Program, 1985 Revision, commits to a program which complies with Regulatory Guide 1.33, Revision 2, February 1978, which adopts the requirements of ANSI N18.7-1976. ANSI N18.7-1976, Section 5.2.19.3 states that tests shall be performed following plant modification or significant changes in operating procedures to confirm that the modification or changes reasonably produce expected results, and that the change does not reduce the safety of operations.

Contrary to the above, following the modification of valve PCV 1139 in March 1986, as described in Modification 85-30720 for the Auxiliary Feedwater System, the licensee failed to perform a test confirming that the modification reasonably produced expected results and that the modification did not reduce the safety of operations. Also, following the repositioning of Auxiliary Feedwater Pump #22 speed changer to the 20% position, as described in Temporary Procedure Change 86-106, the licensee failed to provide a suitably documented test procedure to assure the required quality of work and to confirm that the procedure change produced expected results.

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

Response

We concur that the test procedure chosen did not adequately cover modification of PCV-1139. A test, PT-Q13, which strokes the valve (without steam) was initially successfully performed. A second test, PT-Q34, which would have adequately tested the function of PCV-1139

with steam, with pump discharge in the recirculation mode, was not performed. The test procedure (PT-Q34) had been modified to permit the substitution of a pump turbine overspeed test, PT-V6. This test, which does require exercise of PCV-1139 in a steam environment, is regarded as being less satisfactory than PT-Q34 for the modification performed.

The test group has reviewed this situation and has concluded that improvements in management control, test procedure development and establishment of acceptance criteria are required in order to preclude future occurrences. Accordingly, a new Post Maintenance Test Criteria sheet has been developed. This sheet identifies the safety function to be confirmed with more clearly defined acceptance criteria. In addition, a generic component based checklist to catalog specific parameters for each component to be tested at Indian Point 2 has been developed. We believe that use of the Post Maintenance Criteria sheet together with the Component Checklist will enable a Post Maintenance Test to be devised which is functionally adequate for all situations. Administrative Directive TAD-11 has been revised implementing these changes.

With respect to the change in Auxiliary Feedwater Pump #22 speed changer from 0 to 20%, our policy is as follows. The Manager for Operations is responsible for the review of all changes in Operating Procedures. He emphasizes in this review process via the Temporary Change Procedures the adequacy of the technical basis for the change and the need for a formal test of expected performance. He also assesses the need for additional review for the potential of an unreviewed safety issue prior to implementation of the modified Operations Procedure. Thereby, in accordance with ANSI N18.7-1976, Section 5.2.19.3, a test is performed, following significant changes in operating procedures, to confirm that the change reasonably produces expected results and that the change has not reduced the safety of operations. This policy is reflected in SAO 102 Revision 11, which is anticipated to be finalized prior to November 15, 1987.