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November 25, 1987

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

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

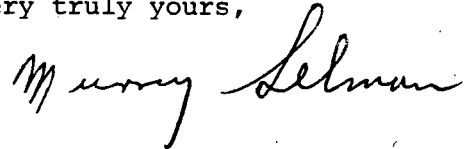
Subject: Response to Inspection Report No. 50-247/87-25

This is in response to your letter of October 28, 1987 concerning routine inspection No. 50-247/87-25 conducted by Mr. Lawrence W. Rossbach and Mr. Peter W. Kelley on September 1, 1987 to October 5, 1987 at Indian Point Unit No. 2.

The Attachment to this letter discusses the circumstances related to these observations as well as corrective actions already taken and to be taken.

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

Very truly yours,



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

Mr. William Russell
Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
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Re: Indian Point Unit No. 2
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ATTACHMENT

Response to Notice of Violation

Violation

- A. Technical Specification 6.2.2.(g) requires that administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed senior operators, licensed operators, health physicists, auxiliary operators and key maintenance personnel.)

Operations Administrative Directive (OAD) 9, Revision 8, "Operations Section Organization" states in part that planned deviations from these guidelines, (e.g. individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, etc., as stated in section 5 of the procedure) require advance approval of the Operations Manager who shall keep the General Manager informed of all deviations, by memorandum which justifies the cause for the deviations.

Contrary to the above, on September 25, 1987, it was determined that deviations from the guidelines as stated in Section 5.3 of OAD 9, Revision 8, involving licensed senior operators, licensed operators and auxiliary operators, had occurred on at least 17 occasions during the period of August 9-29, 1987 and no memoranda from the Operations Manager to the General Manager were provided for approval and justification of the deviations.

This is Severity Level IV violation (Supplement 1).

Response

We concur with the observation that deviations from the guidelines of OAD-9, implementing Technical Specification 6.2.2(g), occurred in the period noted without written memoranda on record from the Operations Manager to the General Manager to demonstrate approval and justification of such deviations. We have reviewed the overtime records for Operations employees for the August 9-29, 1987 period. While our review leads us to concur with the observation, these records indicate that, with very few exceptions, the excessive overtime was spent on such non-safety-related functions as Radiation Health Examinations, Quality Circles (group informational meetings) and general preparation for the refueling outage. These

functions are considered important by the Company and employees are requested to stay overtime with appropriate compensation in order to accomplish them. This mode of scheduling overtime is consistent with our intent to not having employees perform safety-related functions in a fatigued condition.

In recent months, partially as a result of this observation, general managers and section managers have, on several occasions, been reminded of the NRC guidelines forwarded in Generic Letter 82-12. Such instructions were documented in internal memos on September 2, 1987, October 7, 1987, October 21, 1987 and October 22, 1987. In addition, the Vice President of Nuclear Power and in-house licensing personnel briefed the General Managers on the background and content of these overtime limitations at a meeting held on October 21, 1987. Also, section managers have been requested to identify key personnel and/or functions in their organizations that would be affected by these requirements. With this information in hand, overtime planning within the requirements will be facilitated as will the preparation of memoranda justifying deviations from the limitations.

Violation

- B. Technical Specification 6.8.1 requires that procedures be established and implemented for the requirements and recommendations of Appendix A of Regulatory Guide 1.33. Section H.2 of Appendix A states that implementing procedures are required for each surveillance test listed in technical specifications. Technical Specification 4.1 requires that channel checks be performed.

Contrary to the above, in September 1987 procedures were not in place to implement and document the channel checks required by Table 4.2.1 of Technical Specification 4.1.

This is a Severity Level V violation (Supplement 1).

Response

We concur with the observation that, at the time of the inspection, procedures were not in place to implement and document all the channel checks required by Table 4.1.1 of Technical Specification 4.1. While a channel check program existed to qualitatively assess channel functionality, several channels, included in the Technical Specifications, were not included in that program. Accordingly, we have decided to implement a new procedure which will require documentation of channel checks required by the Technical Specifications. This would be in addition to the current log keeping which records various parameters every four hours. This new channel check procedure will require, where possible, each channel of a given parameter to be recorded and a comparison of the channel with other independent channels measuring the same variable. This procedure will be completed, reviewed, and approved within two months after resuming full power operation after the current refueling outage.

We have determined that some channel checks were missing from the program due to inadequate review of proposed Technical Specification amendments

prior to submittal to NRC. Therefore, in an effort to ensure continued compliance, we plan to incorporate a working level review of all proposed Technical Specification amendments which may increase the surveillance requirements currently in effect. This review will be completed prior to the submittal of a proposed change in the Technical Specifications and is intended to assure that the proposed surveillance requirement can be meaningfully performed as stated.