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March 11, 1988

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

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

SUBJECT: NRC Inspection Report No. 50-247/87-38

This letter refers to inspection No. 50-247/87-38 conducted by Mr. Leonard Cheung of the NRC from December 14 to December 18, 1987 at Indian Point Unit No. 2. Your letter dated February 11, 1988 identified the following violation in connection with the inspection:

"10 CFR 50, Appendix B, Criterion V states in part that 'activities affecting quality shall be prescribed by documented procedures, and shall be accomplished in accordance with these procedures.....' Paragraph 5.4.2 of Indian Point 2 maintenance procedure No. MP-16.77, Revision 1, dated October 2, 1987, states that 'any open gaps or other openings on top or side (e.g., conduit entrances) shall be sealed with RTV-7403.'

"Contrary to the above, the inspectors identified that junction boxes No. EWM-7, EWM-8, EPC-4, EPC-5, and EPD-3, with conduit penetrations into the junction boxes, did not have RTV seals.

"This is a Severity Level V violation. (Supplement I)"

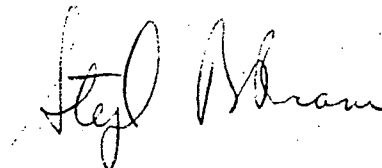
Engineering Specification EI-6009 and Maintenance Procedure MP 16.77 have been revised to read "Any visual, obvious open gaps and other excessive openings..." so as to eliminate any confusion in the future. In response to this violation please note that the original Indian Point 2 Maintenance Procedure MP 16.77 contained the wording "Any obvious open gap..." and the direction given to the craftspeople performing the inspections/repairs was to look for openings and, if any existed, seal with RTV. The word obvious is defined as one that is "visually" detectable. In the subsequent revision to the Maintenance Procedure, the word "obvious" was inadvertently omitted and thus the interpretation of 'open gaps' was not clearly defined although the intent had not changed. It is believed that the omission was an isolated oversight and, therefore, long-term programatic actions are unnecessary.

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

Very truly yours,



87-38

cc: William Russell  
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