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Vice President

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Indian Point Station
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April 21, 1988

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

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

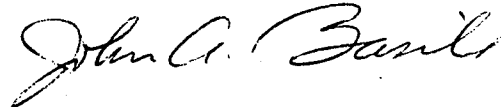
SUBJECT: Response to Inspection Report No. 50-247/87-37

This is in response to your letter of March 22, 1988 concerning inspection 50-247/87-37 conducted by Messrs. Lawrence W. Rossbach and Peter W. Kelly during the period of December 1, 1987 through January 21, 1988 at Indian Point Unit No. 2.

The attachment to this letter constitutes our response to the Notice of Violation transmitted in the inspection report. We acknowledge the accuracy of the observation and corrective actions have been implemented to preclude recurrence.

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

Very truly yours,



Attachment

TEOL
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cc: Mr. William Russell
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Attachment I

Response to Notice of Violation
Inspection Report 50-247/87-37

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
April 21, 1988

Notice of Violation Summary:

Technical Specification 6.5.1.6 requires that the Station Nuclear Safety Committee (SNSC) shall be responsible for review of facility operations to detect potential nuclear safety hazards. Technical Specification 6.8.1 requires that procedures be established and implemented for the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972. Section 5.1 of ANSI N18.7 includes administrative policies and procedures for operations. Operations Administrative Directive OAD-23 requires that trip condition I or II event reports shall be reviewed by SNSC during the next regularly scheduled SNSC meeting.

Contrary to the above, the OAD-23 Condition I Trip Report for a trip which occurred on January 25, 1988 was not reviewed at the regularly scheduled SNSC meeting on January 26, 1988.

Response:

We acknowledge the accuracy of the observation. In this case a verbal report describing the Condition I trip, its causes, corrective actions and management followup was made to the Station Nuclear Safety Committee (SNSC) by the Operations Manager on January 26, 1988. The Operations Manager was unable to locate the written report immediately prior to the SNSC meeting, hence a decision was made to review the report orally as opposed to missing the "next-meeting" review requirement of OAD-23. The subject written report was subsequently located and was reviewed by SNSC on January 28, 1988. Therefore full compliance was achieved on that date.

We believe that this event was isolated in nature, without broader implication. However, the following corrective actions were taken to preclude recurrence:

1. It has been reemphasized to the Operations Manager (OM), the Generation Support Manager and the General Manager, Nuclear Power Generation that the report itself is to be made part of the SNSC review. This was also discussed with SNSC members during a SNSC meeting.
2. OAD-23 was revised to provide some schedular flexibility in presenting Condition I and II post-trip review reports to SNSC.
3. Additional changes were also made as a result of our review of the operating experience with OAD-23 to date. The revised OAD clarifies the responsibilities of the OM, SWS, STA and watch personnel, emphasizes the requirement for thoroughness and the importance of root cause (including personnel performance) determinations, stipulates the role of the plant's reactor trip response team, and provides additional policy and procedural steps concerning data collection and signatures.