

Stephen B. Bram
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

May 18, 1988

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

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

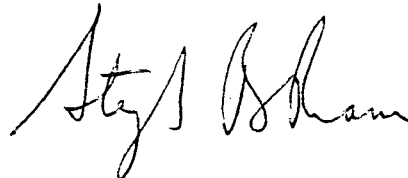
SUBJECT: Response to Inspection Report No. 50-247/88-09

This is in response to your letter of April 21, 1988 concerning inspection 50-247/88-09 conducted by Messrs. Lawrence W. Rossbach and Peter W. Kelly during the period of March 1, 1988 through April 4, 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

cc: Mr. William Russell
Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

Mr. Edward Wenzinger, Chief
Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

Ms. Marylee M. Slosson, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, NY 10511

Notice of Violation Summary:

10 CFR §50.59(b) requires that a report be submitted annually to the NRC which briefly describes changes, tests, and experiments made pursuant to 10 CFR §50.59. Contrary to the above, as of March, 1988 the report of changes made to the facility in 1986 had not been submitted to the NRC.

Response:

We acknowledge the accuracy of the observation. Our Station Administrative Order ("SAO") No. 125, Rev. 7, "Station Written Report Requirements" required that the §50.59(b) report for a given year be submitted on or before June 30 of the following year. The group now responsible for the §50.59(b) report preparation was unaware of this administrative requirement. Their schedule called for the report to be submitted prior to December 31, 1987, consistent with the 10 CFR §50.59 requirement that the report be submitted annually. The preparation and review of this report was delayed due to the 1987 refueling outage and post-outage work.

The subject report for calendar year 1986 was submitted to the NRC on April 28, 1988. Therefore, full compliance was achieved as of that date. Significant changes to the facility, which are described in the annual §50.59(b) report would also be included in our annual update of the Updated Final Safety Analysis Report ("UFSAR"). Our June 30, 1987 UFSAR update included those UFSAR revisions necessary to reflect changes made to the IP-2 facility during 1986.

The annual §50.59(b) report is now more closely-worked with the annual IP-2 UFSAR revision, such that recurrence of this late submittal will not happen. Our goal will be to submit the annual §50.59(b) report for a given year during the second-half of the following calendar year, sometime after the UFSAR update is submitted. Furthermore, SAO No. 125 has been revised to be consistent with 10 CFR §50.59(b); submittal of the annual §50.59(b) report is required on or before December 31 of the following year.

Attachment I

Response to Notice of Violation
Inspection Report 50-247/88-09

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
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