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June 22, 1988

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

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

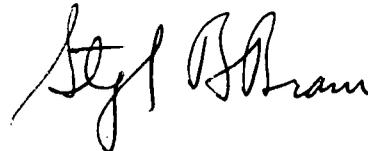
SUBJECT: Response to Inspection Report No. 50-247/88-13

This is in response to your letter of May 23, 1988 concerning inspection 50-247/88-13 conducted by Messrs. Lawrence W. Rossbach and Peter W. Kelly during the period of April 5, 1988 through May 2, 1988 at Indian Point Unit No. 2.

The attachment to this letter provides our response to the Notice of Violation transmitted in the inspection report.

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

Very truly yours,



cc: Mr. William Russell  
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Attachment I

Response to Notice of Violation  
Inspection Report 50-247/88-13

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
June 22, 1988

1. Violation A Summary:

"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. Station Administrative Order 204, Rev. 4 requires that temporary repairs be reevaluated by engineering for continued operation and that the Station Nuclear Safety Committee concur in this reevaluation if final repairs have not been performed by the authorized target date.

Contrary to the above, final repairs were not made to service water strainer blowdown valve SWN-617 by the authorized target date of April 1, 1988, nor was continued operation beyond this date evaluated by engineering and concurred in by the Station Nuclear Safety Committee."

Response:

We acknowledge the accuracy of the observation. On April 28, 1988 the Station Nuclear Safety Committee ("SNSC") reviewed procedure MP-14.83, Rev. 1, entitled "Service Water Blowdown Valves Manual Operation Temporary Repair" and approved an extension of the target due-date for permanent repair of SWN-617 from April 1, 1988 to July 1, 1988. Accordingly, full compliance with temporary repair tracking requirements for SWN-617 was achieved on April 28, 1988.

Additionally, certain corrective actions have been implemented to preclude recurrence of a similar event:

- o Nuclear Power Quality Assurance ("NPQA") documents temporary repairs via the Open Item Report ("OIR") and issues periodic reports delineating open OIRs. Other organizations use these reports to track temporary repair closures. For SWN-617, the OIR was closed upon indication that the Post-Maintenance Test ("PMT") had been completed, however, the PMT failed as a consequence of a relay problem. In the future NPQA will not close the OIR for temporary repairs upon completion of a PMT, as had been done in the case of SWN-617, but will close the OIR upon successful completion of the PMT. This verification will be accomplished by NPQA review of the completed PMT document.
- o The Projects and Planning Section was tracking the temporary repair on PPMIS. PPMIS included a keyword "Temporary Repair", however, no target date for effecting a permanent repair had been entered. The Projects and Planning Section will now enter the target dates for completion of permanent repairs as a further tracking mechanism for temporary repairs.

- o NPQA has increased the level of specificity in its QA Operating Procedure 760 for processing OIRs used to document temporary repairs and issuing periodic OIR status reports. The revised QA-760 requires that the OIR be kept in an open status until there is evidence of acceptable completion of the Work Order and the PMT, or alternatively the temporary repair has been accepted by engineering and reviewed by SNSC as a final repair, or accepted as a modification with a modification procedure issued for record.

Other procedure changes include: 1) the use of a separate OIR for each component to facilitate tracking and closure, 2) identification of the responsible organization in the OIR log and 3) issuing a periodic temporary repair status report (generally monthly) to the organization responsible to track and correct the temporary repair.

In summary, we believe our current temporary repair tracking process is effective and that this was an isolated instance. The NRC inspectors have independently confirmed that our temporary repair tracking process works well and that, in fact, the aforementioned omission appears to have been an isolated instance. We believe that the cited corrective actions will provide reasonable assurance that noncompliance in this area will be precluded.

2. Violation B Summary:

"Technical Specification 6.8.1 requires that procedures be established, implemented, and maintained for the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972. Section 5.1 of ANSI N18.7 includes administrative policies, policies governing adherence to procedures, and policies governing changes to procedures. Station Administrative Order 100, Rev. 17 establishes administrative order policies, requires that policies be followed, and establishes a process for review and revision of administrative orders. Station Administrative Order SAO 102, Rev. 12 also establishes requirements for approval of procedure changes. Station Administrative Order 204, Rev. 4 requires that the project managing authority (PMA) shall track temporary repairs.

Contrary to the above, in April 1988, the quality assurance engineering group had replaced the PMA as the primary responsible organization for tracking temporary repairs and this change in responsibility had not been reviewed and approved as required by Station Administrative Orders."

Response:

We concur with the observation that in certain cases the processes of accomplishing certain tasks have evolved without the requisite procedural revisions. Whereas small, incremental changes can enhance management processes, we appreciate and understand that procedural

revisions should reflect such enhancements of management processes. Procedural adherence is a key ingredient in fostering excellence in operations, and is strongly and repeatedly emphasized to personnel.

In this specific case, Quality Assurance Engineering had not replaced the PMA as the primary responsible organization for tracking temporary repairs. NPQA provides a reporting service to the Projects and Planning Section, which uses this service to identify any temporary repair deadline after which the equipment must be either reassessed for continued operability or replaced.

SAO 204 will be revised by September 1, 1988 to reflect this service provided by NPQA. Other revisions to SAO 204 will be made as required to assure that SAO 204 clearly reflects station policy with regard to work orders.