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July 5, 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

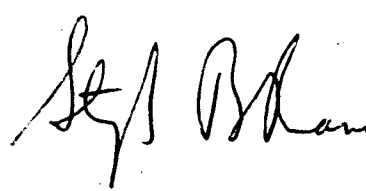
SUBJECT: Response to Inspection Report No. 50-247/88-14

This letter refers to Inspection 50-247/88-14 conducted by Mr. J. Golla of your office during the weeks of April 11-15 and May 2-6, 1988 at Indian Point Nuclear Generating Station Unit No. 2.

Your June 7, 1988 letter outlines a Notice of Violation. Attachment A contains the reply to the violation. Attachment B contains the response for milestones and schedules requested.

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

Very truly yours,



Attachment

cc: Mr. William Russell
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ATTACHMENT A

NOTICE OF VIOLATION SUMMARY

10 CFR 50.55a(g) requires compliance with Section XI of the ASME Boiler and Pressure Vessel Code and Addenda for operational readiness tests of pumps and valves.

Section XI of the ASME Boiler and Pressure Vessel Code IWV-3417(a) states: "If, for power operated valves, an increase in stroke time of 25% or more from the previous test for valves with full-stroke times greater than 10 sec or 50% or more for valves with full-stroke times less than or equal to 10 sec is observed, test frequency shall be increased to once each month until corrective action is taken, at which time the original test frequency shall be resumed."

Data sheets for the licensee's Procedures PT-Q13, Revision 6, Inservice Valve Testing and PT-Q33, Normal and Alternate Charging Valves, requires if the Valve Stroke time exceeds the above IWV-3417 criteria, the frequency must be changed to monthly until the condition is corrected. Table One of Procedure PT-Q13 and Procedure PT-Q33 list the valves to be tested under these procedures.

Contrary to the above as of April 13, 1988 when the stroke time exceeded the IWV-3417 criteria, eight valves, 796, 953, FCV-24-10, FCV-25-15, HCV-5046, HCV-5049, HCV-5050 and PCV-1231 listed in Table One of Procedure PT-Q13 and one valve 204B listed in Procedure PT-Q33, were changed but not maintained on monthly test frequency until their respective conditions were fully corrected.

RESPONSE:

Appendix A to Inspection Report 50-247/88-14 identified that nine valves failed to be tested on a monthly frequency as required by our Inservice Testing Program for valves. These valves were correctly identified for increased testing frequency from quarterly to monthly based on test results. However, due to inadequate review of post maintenance test results, they were incorrectly returned to quarterly testing frequency.

All nine valves were immediately tested and placed back on monthly testing frequency. Test results establish the operability of all nine valves.

The administrative procedure for determining test frequency has now been strengthened to require Test Engineer approval prior to returning valves to quarterly frequency. In addition, a Test Engineer now tracks the completion of all Section XI program valve testing to prevent incorrect test frequencies.

Full compliance with our IST valve testing program was achieved on April 15, 1988, when the above testing was completed. Changes to our program administration provide reasonable assurance that similar events will not occur.

ATTACHMENT B

Inspection Report 50-247/88-14 requested that details of initiatives, including milestones and schedules, be provided concerning improvements in our Inservice Testing Program. Below is the requested information.

A. Improve repeatability for IST pump vibration data.

Although the existing use of hand-held vibration instruments meets the requirements of our program, there may be opportunities for potential improvements associated with the use of improved detectors. Primary benefits may be in lowering the detectable threshold of our trending analysis program by improving repeatability of data. A study is currently in progress and is expected to be completed by late 1988 to evaluate, on a cost benefit basis the decision to obtaining enhanced equipment.

B. IST valve stroke acceptance criteria.

The current maximum valve stroke times are based on Technical Specification maximum stroke times. An alternative method is to set maximum allowable times based on trending actual valve data and adding reasonable tolerance not to exceed Technical Specification limits. This alternative method results in action levels sooner than the current method and may increase the potential to predict and prevent valve failure. A pilot program for this alternative criteria is being developed in conjunction with a review of the administration of the IST program and is expected to be ready for implementation late this year.

C. Results Trending Program.

A review of the IST Program is currently in progress by the Test and Performance Engineer. A part of this review includes the IST results trending program. This review is expected to be completed by September of this year. A consideration of potential improvements will follow.