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CONSOLIDATED EDISON COMPANY OF
NEW YORK INC.
INDIAN POINT STATION
BROADWAY & BLEAKLEY AVENUE
BUCHANAN, NY 10511

July 31, 1988
IP3-88-051

Re: Indian Point Unit No. 2 and 3
Docket No. 50-247 and 50-286

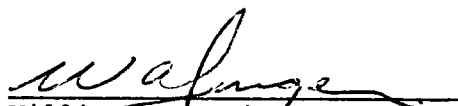
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U.S. Nuclear Regulatory Commission
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SUBJECT: Response to Combined Inspection Report Nos. 50-247/88-01;
50-247/88-17; 50-286/88-09

This responds to your letter of June 21, 1988 concerning inspection 50-247/88-01 and 50-247/88-17 conducted by Mr. R. K. Struckmeyer during the period May 9, 1988 through May 13, 1988 at Indian Point, Units 1, 2, 3. Attachment I to this letter provides our response to the inspection report.

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

Very truly yours,


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Resident Manager
Indian Point Unit No. 3


Steve B. Bram
Vice President, Nuclear Power
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Attachments

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ATTACHMENT A

1. Concern:

The inspector discussed the methodology for calibration with the licensee, and stated that a complete calibration should include all channel parts and components from the detector or sensor to all readout locations. This would include the injection of test signals from calibrated test equipment at the point where the sensors make electrical connection on the meteorological tower, followed by any necessary adjustments to bring the "as found" readouts into conformance with expected values.

Discussions with the licensee regarding this matter were inconclusive with respect to whether full channel calibrations for each sensor have routinely been accomplished.

Response:

Differences were noted in the definition of full channel calibrations as interpreted by the Inspector and Indian Point. The present semi-annual calibration methodology does not include injection of a signal from calibrated test equipment at the point where the sensors make electrical connection on the meteorological tower. Test equipment and fixtures necessary for such calibration will be purchased. If the equipment is received and tested, in time, new calibration procedures incorporating this system calibration will be developed and this system implemented by June 30, 1989.

2. Concern:

The licensee utilizes a vendor laboratory for the preparation of spiked samples, which are sent to the NYPA lab for analysis along with routine samples. As discussed in the previous (1985) inspection report covering the REMP, the licensee had identified anomalies in the data obtained from spiked charcoal cartridges. At that time, the licensee stated that the difference between the activity reported by the vendor laboratory (which prepared the spike samples) and the activity detected by the vendor used for routine analyses may have been due to inadequate spiking techniques and/or to positioning of the source relative to the detector. During the current inspection, the licensee (Con Ed) stated that these anomalies still occur, though not as frequently, despite the replacement of both vendor laboratories. The licensee further stated that additional effort will be expended in an attempt to resolve this problem, and a proposed solution will be developed and submitted to NRC Region I by July 31, 1988.

Response:

The JAF Environmental Lab QC samples are generated by depositing activity using an aerosol containing radioactive material. Indian Point QC samples are prepared by injecting a contaminated liquid on the cartridge. The difference in these methods provides substantially different activity distribution. Beginning in 1989 a vendor laboratory which prepares the charcoal cartridge spikes in a manner similar to that employed by the JAF Environmental Lab will be used for the Indian Point QC samples.

3. Concern:

The inspector reviewed the environmental laboratory quality control procedures for Con Ed and NYPA, and found that each utility uses a different set of acceptance criteria for QC samples. The criteria used by Con Ed (as given in procedure No. EHS-Q-5.12), Rev. 2, "Quality Control Program." Section 5.4.3) are quite liberal. The inspector discussed with the licensee the need for utilizing criteria that are generally accepted by the industry and that can be supported by reference to the literature. Representatives of Con Ed and NYPA stated that a mutually agreeable set of acceptance criteria would be chosen and QC procedures would be revised as necessary to reflect these. The licensee (Con Ed) stated that this issue will be addressed in this submittal to NRC Region I by July 31, 1988.

Response:

Mutually agreeable acceptance criteria, supported by reference to the literature, and revised QC procedures will be in place by December 31, 1988.

4. Concern:

The inspector reviewed selected results of the laboratory's sample analyses, and determined that there was reasonable assurance that the lab could meet the technical specification requirements for LLD. However, the data available during the inspection was inconclusive regarding whether the LLDs for air particulate gross beta analyses could be met. The licensee (Con Ed) stated that it would supply the necessary information to support its determination that these LLDs are being achieved. This information will be included in the submittal to NRC Region I by July 31, 1988.

Response:

During the inspection a sample blank was counted at the JAF Environmental Lab to demonstrate that the required LLD was met. A copy of the sample count data sheet was provided to the inspector for documentation. The inspector believed that this process should be conducted periodically and the documentation maintained. In response to this concern, the JAF Environmental Lab has begun to implement a program whereby blank samples will be analyzed at the time of system calibration and documentation maintained to demonstrate achievement of all required LLDs.

5. Concern:

A QC sample for air particulate and iodine monitoring is supplied to the laboratory about once per month. This sample consists of the filters collected at one monitoring location used exclusively for this purpose. For this reason, the nature of the sample is obvious to the laboratory. The inspector discussed with the licensee the importance of submitting QC samples that the lab will analyze as part of this routine throughput; i.e., without knowledge that the sample is part of the QC program. The licensee stated that a method would be implemented by which all air particulate/iodine samples would be coded in such a way as to make it difficult for the lab to know whether a sample is routine or part of the QC program.

Response:

Review of the raw sample analysis data indicates that the JAF Environmental Lab treats QC samples no differently than other samples (i.e., consistent sample count times are documented). To further obscure the nature of the QC samples, an alpha-numeric sample coding system will be implemented beginning on September 1, 1988.

6. Concern:

The results of the licensee's vendor laboratory participation in the Eighth International Environmental Dosimeter Intercomparison Program appear to be biased low, as do licensee data relative to the NRC TLD data.

Response:

A visit to the vendor laboratory was made on July 21, 1988 to discuss the program and examine their procedures and methodology. The vendor lab intends to participate in the next intercomparison program scheduled for the fall of 1988 to determine if the results are indicative of a potential problem. We will review the results of this intercomparison program and we will compare the vendor laboratory results with those of the NRC TLD program.