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August 5, 1988

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

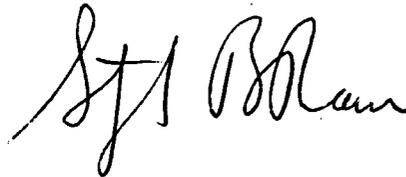
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SUBJECT: Response to Inspection Report No. 50-247/88-15

This responds to your letter of June 28, 1988 concerning inspection 50-247/88-15 conducted by a special inspection team during the period April 8, 1988 through April 27, 1988 at Indian Point, Unit 2. Attachment A to this letter provides our response to the inspection report.

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

Very truly yours,



Attachments

cc: Mr. William Russell
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ATTACHMENT A

Unresolved Item: 88-15-01

- a) Incorporate a transition point to EOP E-3 into step 40 of EOP E-O.

Status: The incorporation was completed as Revision 4 to the Emergency Operating Procedure (EOP).

- b) Develop an adequate technical justification for EOP FR-C.1 omitting step 10; for EOP FR-C.2 omitting step 3; and for EOP FR-C.3 omitting step 3.

Status: Step deviation documentation is now complete.

- c) Correct EOP ES-0.2, step 13 to read, in part, "Less than 25 F/hr"

Status: This correction was completed as Revision 5 to the EOP.

Unresolved Item: 88-15-02

- a) Perform a page by page review of EOPs and related procedures to identify component labeling required to support EOP operation outside of containment.

Status: This review has been initiated and will be completed by September 30, 1988.

- b) Ensure that all component labels and/or tags required in support of EOP step performance are in place.

Status: This task is being performed in conjunction with an overall station label upgrade program. Component labels for equipment outside of Containment required to support EOP operations will be completed by December 31, 1988.

Unresolved Item: 88-15-03

- a) Revise EOPs where required to reference applicable System Operating Procedures (SOPs) which provide detailed local operating instructions for the Main Steam Isolation Valves and the Steam Generator Atmospheric Steam Dump Valves.

Status: Completed as Revision 5 to the EOP

- b) Improve procedure steps to prevent undesired injecting of the Safety Accumulator contents into the RCS.

Status: Completed as Revision 5 to the EOP

Required Action: Install permanent access to MOV-882

Status: An Engineering Service Request has been initiated. Permanent access is expected to be achieved by December 1989.

Unresolved Item: 88-15-04

- a) Clarify step 4 of EOP E-3 to eliminate possible confusion regarding feeding a ruptured and faulted Steam Generator.

Status: As noted in the report, Revision 1A of the Westinghouse Owners Group Emergency Response Guidelines (ERG) now inserts a CAUTION in E-3 which eliminates this concern. ERG Revision 1A will be fully incorporated by September 30, 1988.

- b) Revise ECA 3.3, step 7 to provide instructions to transitions if RVLIS is not available.

Status: Completed as Revision 5 to the EOP.

Unresolved Item: 88-15-05

- a) Revise writer's guide to require foldout page on every left hand page.

Status: Completed as Revision 1 to the writer's guide.

- b) Standardize step wording where appropriate for steps which appear in several procedures (eg. ES-1 step 18 vs. ES-1.2 step 2: ES-03, step 7 vs. ES-1.2 step 19.c).

Status: The two specific examples of this problem noted in the report have been corrected. Additionally, all EOPs have been reviewed for similar inconsistencies. All identified inconsistencies in step performance wording have been standardized where appropriate in Revision 5 to the EOP.

- c) Revise writer's guide to include definitions of verbs used in EOPs.

Status: Completed as Revision 1 to the EOP.

- d) Revise EOP FR-H.1, transition step 26 to provide a reminder to the operator to read the CAUTIONS before ES-1.1 step 1 prior to continuing with ES-1.1 step 7.

Status: Completed as Revision 5 to the EOP.