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December 21, 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. 50-247/88-28

This is in response to the letter dated November 21, 1988 concerning routine Inspection No. 50-247/88-28 conducted by Mr. Leonard J. Prividy on October 3 to 7, 1988 at Indian Point Unit No. 2.

The attachment to this letter presents the reply to the observations, including corrective actions which are being and will be taken. The reply includes our response to your request for a discussion of short and long term actions, with schedules.

If you or your staff have any questions, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,

Steph B Bram

cc: Mr. William Russell
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Re: Indian Point Unit No. 2
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Attachment

Response to Notice of Violation

Violation

A. 10 CFR 50.55a(g) requires adherence to Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for inservice testing (IST) of pumps and valves. Technical Specification 4.2 also requires that the IST of pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. The following examples of violations of the requirements of Section XI of the ASME Boiler and Pressure Vessel Code were identified.

1. Article IWV-1100 of the ASME Code, Section XI, 1980 edition, requires, in part, testing for those valves which are required to perform a specific function in shutting down a reactor to the cold shutdown condition, or in mitigating the consequences of an accident.

   Contrary to the above, as of October 7, 1988, the following valves which were required to mitigate the consequence of an accident were not periodically tested as they were not included in the IST Program:

   a. Manual valves SWN-4, 5, 6, 7, 70, 70-1, 27 and 27-1 in the service water system;

   b. Check valve IA-20 in the instrument air system;

   c. Check valves VA "B" and VA "C" on Drawing A208368-05 in the bearing cooling water lines to the Aurora service water pumps; and,

   d. Check valves BFD-6, 6-1, 6-2 and 6-3 in the main feed lines.

2. Articles IWV-2100 and IWV-3410 of the ASME Code, Section XI, 1980 edition, require, in part, that the valves which are required to change position to accomplish a specific function, be classified as active valves. Active valves are also required to be exercised periodically to assure their operational readiness.

   Contrary to the above, as of October 7, 1988, the following valves which are used to mitigate the consequences of an accident, were incorrectly classified in the IST program as passive valves and were not periodically exercised:

   a. Manual valves SWN-29, 30, 31, 32, 38 and 39 in the service water system.

The above two examples collectively constitute a Severity Level IV violation. (Supplement I)

Response

Background

The Indian Point Unit 2 "Inservice Testing Program Summary for the Interval July 1, 1984 through June 30, 1994," Revision 1, was submitted on July 18, 1986. Inspection Report 88-200, transmitted June 7, 1988, indicated the NRC inspection team's position that the above manual and check valves should be included in the IST program and classified as active. Our response, in a letter dated September 9, 1988, explained the reasons for the original classifications of these valves. Nevertheless, the response also committed to the re-evaluation of the classifications for these and the other safety system valves. This evaluation is now in progress.

Corrective Action

Pending the results of this evaluation, the valves identified in the above Notice of Violation will be tested in accordance with Revision 2 of the IST program summary during the first quarter of 1989, or a Relief Request will be submitted with Revision 2. Revision 2 to the IST program summary will be submitted by January 10, 1989.

This revision will also incorporate the available results of the ongoing valve classification evaluation. The evaluation of safety system check valves will be completed by January 31, 1989. The evaluation of safety system manual valves will be completed by May 31, 1989. The results will be incorporated into a subsequent revision of the IST program summary.

Violation

B. 10 CFR 50, Appendix B, Criterion VI, Document Control, states in part "Measures shall be established to control the issuance of documents, such as instruction, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy."

The licensee's Quality Assurance Program, Paragraph 5.2.15, "Review, Approval and Control of Procedures," requires that documents be prepared, revised, controlled and issued in accordance with an approved procedure.

Contrary to the above, as of October 7, 1988, the Inservice Testing (IST) Program Summary document was not being maintained as a controlled document. This document was being revised by the users to reflect changes in certain relief requests and program coverage without formal review and approval.

This is a Severity Level IV violation. (Supplement 1)

Response

Background

The IST program is defined in detail and implemented through a set of quality program procedures which are fully controlled in accordance with our Quality Assurance Program and with 10 CFR 50 Appendix B. Heretofore, the IST program summary has been considered an overview document which provides a summary of key information extracted from the underlying controlled documents.

Corrective Action

In order to assure accurate correlation between the program summary and the corresponding detailed procedures, by January 10, 1989, Revision 2 to our program summary will be incorporated by reference into our quality program procedure TS-SQ-11.017, entitled "Inservice Test Program". This action will place the program summary under full administrative change control.

Full Compliance

Full compliance in both the above matters (A and B) will be achieved by January 10, 1989.

IST Program Enhancements

In order to obtain more management involvement in the IST program, to improve program definition and implementation, and to encourage periodic re-evaluations of IST classifications of components, we are developing a management planning matrix, which will correlate IST program requirements to the organization responsible for executing each requirement and to the associated implementing procedure for each requirement. This document will be finalized and approved for internal use by January 10, 1989.

A review of implementation procedures and functional responsibilities affecting organizations participating in the IST program is scheduled for completion before the end of 1989. Where appropriate, implementing procedures will be modified to assure that program responsibilities outlined in the management planning matrix are fully addressed.