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Vice President

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January 31, 1989

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station Pl-137
Washington, DC 20555

SUBJECT: Response to Inspection Report No. 50-247/88-33

This is in response to the letter dated December 30, 1988 concerning routine Inspection No. 88-33 conducted by Mr. Lawrence W. Rossbach and Mr. Peter W. Kelley from November 8, 1988 to December 12, 1988.

The attachment to this letter provides our response to the Notice of Violation. Following the events of September 25, 1988 which form the basis for this Violation we initiated a review of our station lubrication program. Both our review and the NRC's discussions in Inspection Reports 88-26 and 88-33 indicate that the lubrication schedule utilized at Indian Point 2 is incomplete. A program to upgrade the lubrication schedule has been instituted which will result in a more complete identification of safety-related and non-safety-related equipment requiring lubrication, the frequency with which lubrication should be applied and the type of lubrication to be used. The responsibility for coordination and implementation of this program will also be addressed. It is estimated that there are approximately 25,000 components in the facility, of which a large number will require scheduled lubrication. A continuing review of plant components will be undertaken and the lubrication schedule will be updated and maintained to reflect the results. An outline of the lubrication schedule update program is enclosed for your information as part of the attachment.

We would also like to comment on some of the other concerns expressed in the Inspection Report relating to the station initiatives discussed at recent post-SALP management meetings in the areas of safety perspective, corrective actions and control of operations with respect to their full implementation within a reasonable time frame. We are of course simultaneously interested in assuring that our initiatives are truly effective, comprehensive, and adequately remediate underlying concerns.

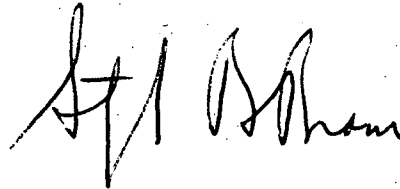
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We would like to point out that we are still in the process of implementing the programs undertaken in response to the 1988 SALP, IPAT and SSFI reviews. The enhancement will take time to become effective. We are not ignoring the value of interim measures while waiting for these longer-term initiatives to become effective. We believe that our safety perspective has improved overall since these reviews. Subsequent to the above reviews, there have been three operational occurrences, each which has demonstrated that the lessons learned from earlier events are being applied. Our response to these events, the first involving the Condensate System's LCV-1158 (Inspection Report 88-26), the second involving the absence of the displacer on the level indication of the RWST (Inspection Report 88-26 and LER 88-14) and the third involving the freezing of the RWST and CST instrument lines (Inspection Report 88-33 and LER 88-20), was consistent with our understanding of the NRC's expectations and demonstrates that our operators and other cognizant personnel have been sensitized to the importance of thorough and prompt immediate corrective actions in circumstances where plant safety could be impacted. However, we agree that this sensitivity and awareness must continue to be stressed in overall station operation to preclude further events.

We look forward to discussing the implementation status of our ongoing initiatives with NRC personnel at upcoming management meetings. In the interim, if you or your staff have any questions, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,



cc: Mr. William Russell
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ATTACHMENT

REPLY TO NOTICE OF VIOLATION
DATED DECEMBER 30, 1988

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
January 31, 1989

Violation

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented and maintained covering the requirements and recommendations of section 5.1 of ANSI N18.7-1972. ANSI N18.7-1972, section 5.1 requires, in part, that a maintenance program shall be developed to maintain safety-related equipment at the quality required for it to perform its intended function. Maintenance that can affect the performance of safety-related equipment shall be properly preplanned and performed in accordance with written procedures.

Central Operations Procedures (COP) 6-2-7, "Station Auxiliary Equipment Lubrication Program," section 3.2, states, in part, that the lubrication schedule will list the equipment to be lubricated, recommended lubricant, and frequency of lubrication.

Contrary to the above, on September 25, 1988, the lubrication program was not adequate to maintain the auxiliary feedwater pumps (ABFPs) at the quality required to perform their intended function, in that the #23 ABFP coupling failed due to lack of lubrication. The lubrication schedule did not specify the lubrication frequency for the ABFP couplings and other safety-related components, nor were such lubrication activities properly preplanned and performed.

This is a Severity Level IV Violation (Supplement I).

Response

As soon as possible after the failure of the #23 ABFP coupling, the coupling was removed, disassembled and inspected. It was determined that the coupling internals had worn gear teeth, lacked lubrication and was rusted. The coupling was replaced with a new identical coupling and #23 ABFP was satisfactorily tested and was put back in service.

Due to the fact that all three ABFPs use similar couplings from the same manufacturer, this process was then repeated on #21 ABFP. The coupling was found to be also worn and rusted. This coupling was also replaced with a new coupling and #21 ABFP was satisfactorily tested and was put back in service.

The same process was then initiated on #22 ABFP. However, the coupling was in good condition and well lubricated. The coupling was reinstalled and #22 ABFP was satisfactorily tested and was put back in service.

SNSC instituted a task force to determine, for safety-related equipment, what couplings were being utilized and the lubrication status of these couplings. The task force determined that the couplings utilized on the ABFPs were not installed on any other safety-related equipment and that the lubrication status of couplings on other safety-related equipment was satisfactory.

As discussed in Inspection Reports 88-26 and 88-33 the difficulties with the lubrication program are due to the incompleteness of the lubrication schedule. The lubrication schedule is described in Central Operations Procedure (COP) 6-2-7, "Station Auxiliary Equipment Lubrication Program." Per the COP, the schedule is to designate which equipment is to be lubricated, the recommended lubricant, and the frequency of lubrication. The lubrication schedule consists of a computer generated printout of equipment that requires periodic lubrication. The schedule lists the equipment, the work required to lubricate the equipment, type of lubricant required, when the equipment was last lubricated, when the next lubrication is required, and the lubrication frequency. At the beginning of each month, the schedule is reviewed by a maintenance foreman to determine which equipment needs to be lubricated. At the end of the month, the schedule is updated as to which equipment has been lubricated.

As a result of the #23 ABFP coupling failure, a review of the existing lubrication program requirements was begun in September 1988 to confirm that the lubrication currently required in the lubrication schedule for safety-related and non-safety-related equipment at Indian Point 2 is in accordance with vendor recommendations as to type of lubrication and frequency of lubrication. This ongoing review correlates the vendor requirements to Con Edison specifications and as necessary develops revised lubrication data for the lubrication schedule. The results of this effort are then reviewed by the Power Generation Lubrication Specialist. The components on approximately 30 safety-related and non-safety-related pumps have been reviewed to date and the changes to the lubrication schedule are currently being implemented by Maintenance.

Generally, the System Engineers will review lubrication requirements and additionally on a case-by-case basis when a concern or question is raised by Planning or Maintenance. Additionally, when new equipment is added, the System Engineer will review the vendor requirements, correlate the requirements to Con Edison specifications and develop new lubrication data for the lubrication schedule. The results will then be reviewed by the Power Generation Lubrication Specialist and forwarded to Maintenance for implementation.

Since it is estimated that there are approximately 25,000 components in the facility, of which a large number will require scheduled lubrication, this updating will take time. It is projected that a majority of the update program will be completed by August 1990 with some small part remaining to be completed thereafter.

The enclosed table provides an outline of the lubrication schedule update program.

TABLE

Lubrication Schedule Update Program

- I. Controls
- Procedure to define the process
 - Forms with sign-offs required from the System Engineer and the Power Generation Lubrication Specialist
- II. Identify All Safety-Related And Non-Safety-Related Equipment At Indian Point 2 To Be Lubricated
- Compare list to Operating Experience Data Base
- III. Identify Requirements For Each Component
- Review vendor information
 - Convert to Con Edison lubrication specification
 - Identify lubrication frequency
 - Recommend for Lubrication Oil Sampling Program
- IV. Review
- System Engineer to review
 - Power Generation Lubrication Specialist to review
- V. Implement
- Planning and Maintenance to implement

NOTE: Items II and III are concurrent activities.