

William J. Cahill, Jr.
Vice President

Consolidated Edison Company of New York, Inc.
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Regulatory

File Cy.

June 28, 1973

Re Consolidated Edison Company
of New York, Inc.
Indian Point Unit No. 3
AEC Docket No. 50-286

Mr. Richard C. DeYoung
Assistant Director for
Pressurized Water Reactors
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. DeYoung

Your letter dated March 30, 1973 required a commitment to implement the requirements and recommendations of ANS 3.2, Draft No. 8 (now ANSI N18.7) or to provide and justify alternatives.

Consolidated Edison, by letter dated April 12, 1973, agreed to implement both the requirements and recommendations of Section 4.0 of ANSI N18.7. With regard to the remaining provisions of ANSI N18.7, Consolidated Edison intends to comply with all of the requirements and recommendations with one exception:

ANSI N18.7, Section 5.3.8.1, contains a recommendation that "a precaution that the operator not place a system in "manual" unless misoperation in "automatic" is apparent..." be included in every procedure.

Rather than state this precaution in every emergency procedure, it is felt more appropriate to address this section of ANSI N18.7 in a statement on operating policy as part of an Administrative Directive. This approach will serve to keep procedures brief and concise and thus allow for more efficient use of the operator's time in situations where time is of the essence.

In addition, we wish to take this opportunity to address two additional recommendations of ANSI N18.7. Although we do not view our administrative practices as being in conflict with either of them, it is recognized that our interpretation of the recommendations may differ from that of the Commission.

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Mr. Richard C. DeYoung
Atomic Energy Commission

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June 28, 1973

Re Consolidated Edison Company
of New York, Inc.
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ANSI N18.7, Section 5.3.8.1, recommends "that probable magnitudes of parameter changes" should be included in the symptoms section of emergency procedures.

To include magnitudes of parameter changes in the emergency procedures, unless they are highly probable, would tend to provide misleading information to the operators since they would come to expect only these magnitudes of change. This could possibly result in a relatively minor malfunction not being handled as soon as possible.

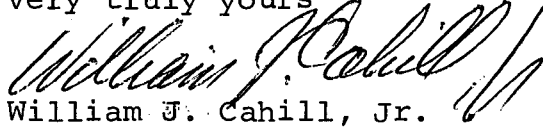
Additionally, the alarm procedures detail alarm setpoints and the log sheets detail the normal operating ranges for logged parameters. Through these, the operator will become aware of off-normal conditions and by monitoring pertinent parameters, will be able to judge the severity of the condition.

Therefore, it is not intended to list magnitudes of parameter changes in emergency procedures unless they can be predicted with a high degree of certainty.

ANSI N18.7, Section 6.3.3, recommends "The procedures used should be similar to those discussed in 5.3.3 and 5.3.4, and they should be modified to require variation in control parameters, such as pumps stops and restarts, cycling valves and varying flows so that system performance can be evaluated".

Instead of modifying the normal plant operating procedures, separate test procedures are prepared. These procedures describe the object of the test and the steps necessary to realize that objective. The plant is operated in accordance with the normal operating procedures during testing operations. The test procedures are written in a format that closely parallels Section 5.3.4 and specify variations in control parameters. In essence, by utilizing test procedures along with normal plant operating procedures, rather than modifications of the latter, it is felt that the intent of the recommendation is satisfied.

Very truly yours


William J. Cahill, Jr.
Vice President

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CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: 50-286		

DESCRIPTION:
Ltr re our 3-30-73 ltr...furnishing info regarding Quality Assurance Program.....

PLANT NAME: Indian Point Unit # 3

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