

William J. Cahill, Jr.
Vice President

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September 3, 1976

Re: Indian Point Station
Docket No. 50-286
Inspection No. 76-19

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U.S. Nuclear Regulatory Commission, Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

This refers to an inspection conducted by your Mr. John Streeter on July 21-23, 1976 of activities authorized by NRC License No. DPR-64 at our Indian Point Station. Your August 12, 1976 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements. This apparent item of non-compliance was enclosed as Appendix A to your letter. With respect to this item, which was categorized as an "Infraction", our response is as follows:

On May 13, 1976 with the reactor critical at hot zero power conditions, voltage was lost to 480 volt Bus 6A. The operators responded to this condition by immediately verifying that proper automatic operations had occurred and by starting the redundant components that had tripped. This response included restoration of power to the affected bus within approximately 15 minutes.

Technical Specification 3.7.C.1. states:

If the electrical distribution system is not restored to meet the requirements of 3.7.A within the time periods specified in 3.7.B, then:

1. If the reactor is critical, it shall be brought to the hot shutdown condition utilizing normal operating procedures. The shutdown shall start no later than at the end of the specified time period.

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No time period however, is specified in 3.7.B for the 480 volt buses. Thus an ambiguity exists in the requirements of 3.7.C.1 for this case. For example, in the Standard Technical Specifications, an 8-hour time period would be allowed for the case of the 480 volt buses out of service.

Pending clarification of the requirements of 3.7.C.1. by the Regulatory Staff, or future amendments to the specifications to clarify 3.7.C.1, the following corrective actions have been taken:

1. In the future, the corrective action initiation time period for Limiting Conditions For Operation violations will be assumed to be immediately unless a time period is specifically identified.
2. All operators have been instructed that on loss of a 480 volt bus section when the reactor is critical, a controlled shutdown should be initiated simultaneously with corrective action to restore the bus service.

Very truly yours



William J. Cahill, Jr.
Vice President