

Carl L. Newman  
Vice President

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July 26, 1976

Indian Point Station  
Docket No. 50-286  
Inspection No. 76-15

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

Dear Mr. Brunner:

This refers to an inspection conducted by your Mr. J. Streeter on May 24 - 28, 1976 of activities authorized by NRC License No. DPR-64 at our Indian Point Station. Your July 2, 1976 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements. The Notice of Violation enclosed as Appendix A to your letter stated that this item had been classified as a deficiency. With respect to this item, the following is offered:

The purpose of Section 5.2.1 of TP-8.5.2 was to determine the amount of overlap between the intermediate and power range instruments. To meet this end, the test procedure data sheet had spaces available to record overlap data when power range channel #41 indicated 10% reactor power. A value of 10% reactor power, was chosen so that only one set of data need be recorded to demonstrate that the acceptance criteria of at least 1 1/2 decades of overlap be met. The recording of data at 10% reactor power was therefore entirely arbitrary and as long as we could demonstrate that 1 1/2 decades of overlap existed, the purpose of the test procedure would be satisfied.

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As a precautionary measure during the initial phase of the start up test program, the gains of the power range channels were initially increased so that they would read approximately 3 times higher than actual reactor power and were then subsequently reduced so that the power range instruments would read approximately 2 times actual reactor power. Because of this unique situation during the beginning of the power ascension test program, test personnel took additional overlap data far in excess of the requirements of the test procedure. In fact, overlap data was recorded at an indicated power level of 22%, 29%, 32%, 38%, 44%, 55%, 61%, 68%, 72%. An analysis of these data demonstrated that there is greater than 1 1/2 decades of overlap.

We believe that there was no substantive change made to the test because the test procedure assumed that the indicated power would be equal to actual reactor power. Keeping this in mind, the note on Data Sheet No. 2 ("Read all channels when designated channel is value shown") requires that the data be recorded when actual reactor power is 10% and the indicated power is 20% because of the increased gains. The required data was recorded when the power range channel indicated 22%, 29%, 32%, 38%, 44%, 55%, 61%, 68%, 72% which satisfies the requirements of the test without changing the test procedure.

In summary, it was recognized at the time the test was conducted that since the gains of the power range channels were conservatively set to indicate a power level higher than actual, the test was not considered complete and would be repeated after the high power calorimetrics were performed and the power range instruments realigned with the normal gains. Although the change made to the procedure was of a minor nature and was done only to clarify the difference between actual and indicated power, the requirements of INT-ADMIN 1.0 should have been followed. To prevent recurrence, cognizant personnel have been reminded of the importance of following all procedural requirements.

Very truly yours



Carl L. Newman  
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