

Consolidated Edison Company of New York, Inc.
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May 13, 1976

Docket Nos. 50-003
50-247
50-286

Mr. Paul R. Nelson, Chief
Fuel Facility and Materials Safety Branch
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Nelson

This letter responds to your letter of April 20, 1976 relative to an inspection conducted by your office on March 16-19, 1976 of activities authorized by NRC License Nos. DPR-5, DPR-26 and DPR-64. Your letter indicates that certain of our activities were not conducted in full compliance with NRC requirements.

Our specific response to each Item of Non-Compliance as set forth in the Notice of Violation enclosed as Appendix A to your letter follows.

Item A1. Contrary to the requirement of Section 5.4 of the Environmental Technical Specification Requirements (ETSR) for Unit 3, detailed, written, procedures reviewed and approved by the Environmental Protection Committee, were not available for the following required activities:

- a. Radiological environmental sample preparation and analyses by contractors.
- b. Calibration of instrumentation used in the above analyses.
- c. Calibration, use and control of TLDs used in the environmental program, and
- d. Maintenance and calibration of meteorological instrumentation.

Response: The procedures specified in item a-c above have been received from our contractors and are in the process of being forwarded for review to the appropriate reviewing Committee.

Regarding item d above, at the 25 June 1975 meeting of the EPC, the Committee approved the "Indian Point Meteorological Program". This document, which has been available in the files of the EPC, states that "Tower maintenance, quality assurance, instrument calibration, and on-site instrument performance is subcontracted to York Research". The procedure on maintenance and calibration of the meteorological instrumentation was on file at York Research, Inc. and had been reviewed by personnel of the Nuclear and Emissions Control Engineering Department. Section 5.1.1.3 of the ETSR for Unit 3 states that

"The Chief Nuclear and Emissions Control Engineering...(has) primary responsibility for execution of environmental surveillance studies.

The environmental surveillance programs... will be performed by the licensees staff and/or through contractual arrangement between the licensee and its contractors".

Since the EPC reviewed this environmental surveillance program which states that instrument maintenance and calibration has been subcontracted to a qualified contractor and personnel of Con Edison responsible for carrying out the program had reviewed the procedures it is our belief that the EPC has fully discharged its responsibilities.

Item A2. Contrary to the requirement of Section 5.4 of the ETSR for Unit 3, the detailed, written procedures related to the biological studies and monitoring programs were not reviewed and approved by the EPC.

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Response: As noted in the Inspection report, procedures were submitted to the EPC for review on March 11, 1976. Upon receipt of these procedures, the EPC began the review process. As these procedures were available and are now in the process of being reviewed by the EPC, we consider that this item does not constitute a violation.

Item B. Contrary to the requirement of Section 4.1.2.a(3).A of the ETSR for Unit 3, no fish collections or analyses were made at Unit 3 since February 22, 1976, during which time one or more circulating water pumps were in operation each day.

Response: Fish collections at Unit No. 3 were discontinued when problems arose with the temporary collection screen in the fish collection pit. This screen served the dual function of insuring that all fish washed off the traveling screens were collected and also prevented debris washed off the traveling screens from clogging the fish collection pit drainage pipe. With the collection screen removed for fabrication, debris washed off the traveling screens clogged the drainage pipe thereby causing flooding of the collection pit which made fish collection and analysis impossible. Upon fabrication and installation of the collection screen, on April 22, 1976, the collection pit was pumped out, the drainage pipe cleared and fish collections resumed.

Item C. Contrary to the requirement of Section 3.3.4 of the ETSR for Units 1 and 2, the pH of the discharge circulating water was not measured during discharges as specified since December 16, 1975.

Response: Measurement of pH in the discharge circulating water during discharges was discontinued in favor of the more recently developed circulating water system pH control and monitoring requirements of the Unit 3 ETSR. However, we have reinitiated the pH measurements required by said ETSR in addition

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to the pH control and monitoring requirements of the Unit 3 ETSR. Compliance with both sets of ETSR will continue until such time as the Units 1 and 2 ETSR are cancelled.

Very truly yours

Carl L. Newman

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Vice President