

William J. Cahill, Jr.  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

November 9, 1979

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

Mr. Darrell G. Eisenhut  
Acting Director  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Eisenhut:

This letter is in response to your September 21, 1979 letter which requested information concerning surveillance procedures and multiple equipment failures.

Consolidated Edison has completed a review and has determined that events similar to those described in your September 21, 1979 letter have never occurred at the Indian Point Unit No. 2 plant. We believe that the plant design, the surveillance and quality assurance requirements and the Company review procedures make occurrence of similar events or failure modes not previously considered very unlikely. The Company is also participating in various industry reviews (NUREG-0578 and IE Information Notice 79-22) which are already identifying areas where studies may result in the consideration of new or revised events as part of the basis for assuring the continued safety of nuclear plants. These investigations are similar to the kind requested by your September 21, 1979 letter.

We have also reviewed the engineered safety system surveillance procedures including the safety injection system logic test procedure and have determined that there are adequate and appropriate cautions included in the procedures to ensure that the plant operators and supervisors avoid challenges to the protective features of the Indian Point Unit No. 2 plant. Con Edison has long recognized the need for these cautions and has included them in our surveillance procedures. For example, in the Safety Injection System Logic Test procedure there is a "Precautions and Limitations" section which has eight specific instructions for the plant operators and supervisors; also there are applicable cautions throughout this surveillance procedure. In addition, the two logic trains are physically separated from each other and supplied by different power sources. Also, the test switch design on the safeguard system panel is such that the switch must be rotated (disarming the trip relays) before it can be depressed (actuating the trip matrix).

Con Edison's Station Nuclear Safety Committee (SNSC) has reviewed your September 21, 1979 letter in relation to the conduct of operations at the plant. It has always been the plant's policy to correct potential problems before they occur. The Committee reviews procedures to minimize the chances of having an occurrence as described, but when a problem develops, the Committee takes steps to prevent a recurrence.

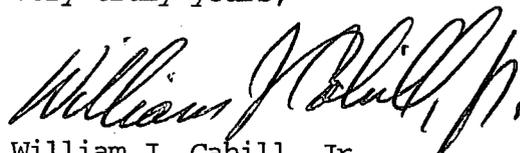
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Management policies and procedures assure that equipment failures in safety related systems are pursued. The Station Nuclear Safety Committee and the Company's Nuclear Facilities Safety Committee review any failure that results in a Licensee Event Report or that leads to a reduction in the safety system ability to function as required. In addition, we review Licensee Event Reports submitted by other facilities to determine their applicability to Indian Point Unit 2. In summary, appropriate cautions are currently included in our surveillance procedures.

This information is being submitted pursuant to 10 CFR 50.54(f) and forty (40) copies of this submittal are being provided. Should you or your staff have any questions, please contact us.

Very truly yours,



William J. Cahill, Jr.  
Vice President

Subscribed and sworn to  
before me this 9<sup>th</sup> day  
of November, 1979.



Notary Public

THOMAS R. McLAUGHLIN  
Notary Public State of New York  
No. 24-4618495  
Qualified in Kings County  
Commission Expires March 30, 1981

cc: Mr. Victor Stello, Jr., Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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