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March 11, 1980

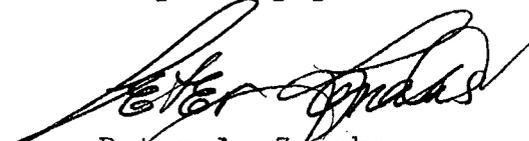
Re: Indian Point Unit No.2
Docket No. 50-247

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Attachment A explains the actions taken in order to comply with 30 day requirement in the NRC Confirmatory order of February 11, 1980. All the necessary confirmatory documentation is available at the plant site for your, or your on-site inspector's, review.

Very truly yours,



Peter A. Zarakas
Vice President

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ATTACHMENT A

B. The licensee shall implement the following measures within 30 days of the date of the Order:

1. A vendor representative will be stationed on site for engineering consultation at Indian Point Unit 2 and Unit 3 on plant operations and maintenance to increase plant safety. The representative shall be from the NSSS vendor, architect/engineering or start up engineering firm.

Response: A Westinghouse representative has been at the Indian Point site since February 11, 1980.

2. To ensure control room habitability under accident conditions, the licensee shall reexamine ventilation intakes, location of potential plant leakage (ingress and egress), and control room filter capabilities, and submit the results of this review to the NRC.

Response: The Indian Point Unit No.2 control room ventilation system was re-examined including intakes, potential direct leakage sources and filter capability. As built drawings were reviewed and the functional operability of the system was verified by visual inspection of all mechanical equipment and by a functional test of the intake and discharge dampers.

Following verification of proper damper positioning, actual flow testing was performed on all control room external air supply dampers. The leakage was found to be less than the 500 cfm inleakage assumed in the IP#2 FSAR. The control room recirculation charcoal filters which were replaced during the last refueling outage were tested in accordance with RDT-M16-1T and found to have a methyl iodide efficiency of greater than 99%.

Based on the results of the above-mentioned re-examination and testing, the evaluation of control room habitability performed in response to question 14.16 of the IP#2 Final Safety Analysis Report is still applicable.

3. Emergency action levels shall be revised to require notification of the NRC for all events in the emergency classes described in NUREG-0610, September 1979.

Response: Station Administrative Order No. 124 was revised to require notification of the NRC for all events in the emergency classes described in NUREG-0610, September 1979, as contained in Con Edison's submittal to the NRC dated February 14, 1980 from Mr. William J. Cahill, Jr. to Mr. A Schwencer, NRC.

4. The licensee shall comply with the NRC's "INTERIM POSITION FOR CONTAINMENT PURGE AND VENT VALVE OPERATION PENDING RESOLUTION OF ISOLATION VALVE OPERABILITY", as contained in the October 1979 letter to the licensee.

Response: The response to this item is contained in our letter of March 11, 1980 from Mr. Peter Zarakas to your Mr. A. Schwencer.

5. Plant personnel shall be trained or retrained in the following areas within thirty days, or prior to startup if required by the Lessons Learned implementation schedule. Plant personnel shall also be retrained in the following areas within thirty days of the time that there are significant changes to the procedures or requirements applicable to these areas:

Containment and Degraded Core Sampling
 Degraded Core - Training
 Emergency Power for Pressurizer Heaters and Decay Heat Removal
 Containment Isolation
 Containment Purge/Purge Valve Operation
 Subcooling Meter Operation
 Technical Support Center
 Onsite Operational Support Center
 Near-Site Emergency Operations Center
 Emergency Preparedness Plan
 In-Plant Area Airborne Radioiodine Monitors
 Surveillance Testing of Non-ESF Filtration System

Response: Training and retraining of personnel has been completed in all areas. Plant personnel will also be retrained within thirty days of the time that there are significant changes to the procedures or requirements indicated in 5 above.

6. The licensee shall perform diesel generator testing in accordance with Regulatory Guide 1.108 with a corresponding change in the allowable outage time stipulated in the Limiting Conditions of Operations as follows:

<u>Numbers of DG Failures In Prior 100 Tests</u>	<u>Test Interval (Days) (R.G. 1.108)</u>	<u>Allowable Outage Time</u>
0 or 1	30	As Is
2	14	As Is
3	7	As Is
4	3	32 hr.
5	3	8 hr.
6 or more	3	None*

*Plant must achieve hot shutdown within 12 hours and in cold shutdown within the following 30 hours.

Response: All the testing required by Regulatory Guide 1.108 will be performed in accordance with the time frame indicated in the Regulatory Guide.

7. Requirements regarding reactor operator qualifications shall be revised to incorporate the following for applications submitted after June 1, 1980:

a. The following experience shall be required for senior operator applicants:

Applicants for senior operator licensee shall have 4 years of responsible power plant experience. Responsible power plant experience shall be that obtained as a control room operator (fossil or nuclear), field operator (nuclear) or as a power plant staff engineer involved in the day-to-day activities of the facility, commencing with the final year of construction. A maximum of two years power plant experience may be fulfilled by academic or related technical training, on a one-for-one time basis. Two years shall be nuclear power plant experience. At least six months of the nuclear power plant experience shall be at the plant for which the applicant seeks a license.

b. The hot training programs shall be modified so that the training concentrates on the responsibilities and functions of the operator, rather than the senior operator. All individuals who satisfactorily complete this hot training program will be allowed to apply for an operator license. At least three months' experience as a licensed operator is necessary before applying for a senior operator license.

c. The three month continuous on-the-job training for hot operator applicants shall be as an extra person on shift in the control room. The hot senior operator applicants will have three months continuous on-the-job training as an extra person on shift in training.

d. In addition to the presently approved training programs, all replacement applicants shall participate in simulator training programs.

e. Phase II, III and IV cold training program instructors and all hot training program instructors that provide instruction in nuclear power plant operations shall hold senior operator licenses and shall successfully complete applicable requalification programs to maintain their instructor status.

f. In addition to the present operator requalification program requirements, all operator licensees shall participate in periodic retraining and recertification on a full scope simulator representative of Indian Point Units 2 or 3. The frequency of training will be on an annual basis.

Response: For all applicants for reactor operator licensing after June 1, 1980 we will meet the above procedure.