

John D. O'Toole  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, NY 10003  
Telephone (212) 460-2533

June 7, 1982

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

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Darrell G. Eisenhut, Director  
Division of Licensing

Dear Mr. Eisenhut:

By letter dated April 7, 1981, we informed you that "on-shift" staffing guidance of Table III.A.1.2-1 of NUREG-0737 (Table B-1 of NUREG-0654 Revision 1) is being implemented as a result of the NRC February 11, 1980 Confirmatory Order. In addition, we stated that the "within 30 minute and 60 minute" staffing guidance of the aforementioned tables is being implemented within 60 minutes as a result of the same Confirmatory Order. Our April 7, 1981 letter also indicated that we were investigating the feasibility of meeting the "30 minute addition" staffing guidance contained in the subject tables and would advise you when our investigation was completed. Our investigation has been completed and we conclude that we satisfy the intent of the staffing addition guidance as set forth in the subject tables but that the "30 minute addition" staffing is not feasible.

Con Edison's capabilities for staffing additions are presented in the attached table. These additions in an emergency assure the performance of emergency functions in accordance with our procedures and the commitment in our April 7 letter to complete all staffing additions in 60 minutes. The table shows 26 staff additions which include individuals with radio pagers. These individuals will be drawn from a roster of about 45 persons, subject to variation with personnel changes, who will be called by radio pagers in an emergency. These individuals provide redundant emergency function capability since most are capable of performing more than one emergency function.

In addition to providing assurance that an adequate number of personnel will be available at Indian Point within 60 minutes of being notified of an emergency, we have provided our shift personnel with the necessary procedures and equipment to monitor off-site radiation dose rates. This equipment is capable of performing automatically some of the functions which would be performed by the personnel who would be included in the 30 minute addition staffing. Monitoring equipment has been installed around the Indian Point site to measure dose rate and key meteorological

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conditions. These data are instantly transmitted to the MIDAS system which is capable of providing dose projections to on-shift personnel in the Unit 2 Central Control Room. We believe that this equipment and the 60 minute staffing addition provide adequate assurance of Con Edison's immediate response to plant conditions.

Should you or your staff have any questions, please contact us.

Very truly yours,

A handwritten signature in cursive script, reading "John D. O'Toole", with a long horizontal flourish extending to the right.

John D. O'Toole  
Vice President

Attachment

TABLE OF EMERGENCY STAFFING

REQUIREMENTS (a)

<u>EMERGENCY FUNCTION</u>	<u>INDIVIDUAL TO FILL POSITION</u> (b) (c)	<u>CAPABILITY FOR ADDITIONS</u>		
		Shift(d)	"30 Minute"	"60 Minute"
Shift Supervisor	Senior Watch Supervisor (b)	1	-	-
Shift Foreman	Senior Reactor Operator (b)	1	-	-
Control Room Operators (CRO)	Unit 2 CRO and Unit 3 CRO (b) (e)	2	-	-
Auxiliary Operators	Unit 2 Conventional and Nuclear NPOs (b)	2	-	-
Notification/ Communication	NPO Water Factory (b)	1	-	-
H.P. Technician	Watch HP Technician (b)	1	-	-
Chem. Technician	Watch Chem. Technician (b)	1	-	-
Shift Technician Advisor (STA)	Watch STA (b)	1	-	-
Emergency Director	(c)	-	-	1
Offsite Dose Assessment	(c)	-	1	-
Offsite Surveys	(c)	-	2	2
Onsite Surveys	(c)	-	1	1
In-Plant Surveys	Support Facilities Watch Supervisor and Unit 3 HP Technician (b)	-	1	1
Rad. Protection In-Plant	(c)	-	2	2
Chemistry	(c)	-	-	1
Technical Support Center (Core, Electrical, Mechanical)	(c)	-	1	2
Instrumentation Control	I&C Watch Technician (b)	-	1	-
Communicator	(c)	-	1	2
Mech./Elec. Maintenance	Units 1,2 NPOs and Unit 2 Watch Mechanic (b)	-	1	3
<b>TOTALS</b>		<b>10</b>	<b>11</b>	<b>15</b>

NOTES: (a) Table III.A.1.2-1

(b) Indicates individuals on watch at either Unit 1, Unit 2 or Unit 3

(c) Indicates individuals on call by beeper.

(d) Within 30 minutes.

(e) Six (6) Unit 2 ROs are assigned to SRO training through November 1982. Thereafter the Unit 2 watch will have the capability for reactor operator shift additions.