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March 26, 1987

Ms. Marylee M. Slosson, Project Manager  
PWR Project Directorate No. 3  
Division of PWR Licensing - A  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247

Dear Ms. Slosson:

This letter is in response to your letter dated February 4, 1987 which requested clarifying information concerning Salem ATWS (Generic Letter 83-28) Items 2.2.1 and 2.2.1.2. That information is provided in Attachment A to this letter.

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

Very truly yours,



190.3.12.3  
Attachment

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Attachment A

Item 2.2.1 - Program

The licensee's response does not confirm that all safety-related components are designated as safety-related on plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and in information handling systems so that personnel performing activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

Item 2.2.1.2 - Information Handling System

The licensee's response has not confirmed that the information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

Response:

Safety-related components are not necessarily designated as safety-related on all plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, etc. We believe that this is unnecessary in light of the administrative procedures described below, and accordingly have no plans to designate components as safety-related on plant documents such as those cited above.

Station Administrative Order (SAO) No. 204 Rev. 1, entitled "Work Order Procedure", establishes the method for requesting system, structure, or component maintenance. SAO No. 204 also provides the means of implementing approved modifications at Indian Point. That SAO describes the sequence of events to be followed in issuing a work order.

The Operations Manager normally authorizes Work Orders. Pursuant to SAO 204 requirements, the following persons are the only authorizers of Work Orders: General Manager - NPG, Operations Manager, Maintenance Engineer, Instrument and Control Engineer, and for emergency or urgent work, the Senior Watch Supervisor.

SAO 204 requires the Authorizer to verify or designate the Work Order as Class A, Class FP, Class MET, etc. Class A systems are identified in Corporate Instruction CI-240-1, entitled "Quality Assurance Program", Exhibit A. Class Radwaste is identified in CI-240-1, Supplement 1. Class FP systems are identified in CI-240-1, Supplement 2 and in SAO No. 700 entitled "Fire Protection and Prevention Policy." Class MET are identified in CI-240-1, Supplement 3, Table 1.

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The "Classification Support Package" (CSP) methodology, given in Attachment 2 to SAO 204, provides the method for extrapolating the CI-240-1 guidance in determining Class A status on a component level. This CSP was developed from the guidance provided in Con Edison's July, 1984 "System Boundary Classification Package."

In addition to the above, a computerized "Component List" has been developed that provides the capability to assess the classification of a component or equipment by entering the appropriate data into a computer terminal. On the component level, the list identifies the class of the component (e.g. Class A, Class FP, Non-Class A, etc.) in accordance with Corporate Instruction CI-240-1. This list was also developed following the guidance set forth in the "System Boundary Classification Package." The guidance in the "Package" was applied to 31 "Boundary Package Drawings" which designate system boundaries as well as to many other Con Edison drawings. The result is a list of components providing a unique identifier (tag number), the type of component, the quality status (Class A, etc.), a source document reference, a drawing reference and in some cases a function description. The Component List at the present time is being readied for general use.