

Stephen B. Bra
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

March 28, 1990

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Response to Generic Letter 90-01, NRC Regulatory Impact Survey

REFERENCES:

1. INPO letter dated February 7, 1990 from Zack T. Pate to Kenneth M. Carr, NRC
2. NUMARC letter dated February 16, 1990 from Joe F. Colvin to NUMARC Board of Directors

NRC Generic Letter 90-01, dated January 18, 1990, requested our voluntary input to your survey. Your stated purpose for the survey is to provide insight to the time which key nuclear power plant managers spend due to imposed operational inspections and audits. Our completed questionnaires are attached.

The information provided in the attached questionnaires is based on an internal survey of about one-half of the affected vice presidents, managers and supervisors. Their answers were extrapolated, in some cases, to cover others in the same category. We believe that the information provided gives a representative estimate suitable for your purpose.

We welcome the opportunity to provide this feedback. We also support the positions stated in References 1 and 2, and utilized the additional clarifying information attached to Reference 1 in completing the questionnaires.

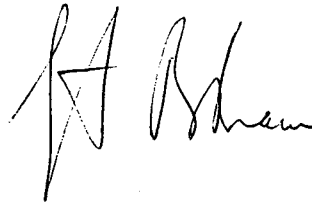
We note that your letter restricts itself to activities related to inspections and audits, and our enclosed data also relate only to those activities. However, a significant amount of our management and staff time is also allocated to response to NRC Generic Letters, Bulletins and Information Notices. We urge you to consider these also in your evaluation of regulatory impact, because their topics are often covered also in INPO programs or other industry initiatives. Also, there is an additional burden in developing the documentation needed especially for NRC submittals and inspections in response to Generic Letters, Bulletins and Information Notices.

9004160142 900328
PDR ADCK 05000247
P PDC

A001
111

Due to the late date of our receipt of Reference 1, we were unable to respond by the March 1 requested date. We hope that this response remains timely for inclusion in your data. Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. Adam". The signature is written in dark ink and is positioned to the right of the "Very truly yours," text.

Attachment

cc: Mr. William Russell
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

Mr. Joe F. Colvin
Nuclear Management and Resources Council
1776 Eye Street, N.W.
Suite 300
Washington, DC 20006-2496

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Team (e.g., IPAT, SSFI, Maintenance)
2. Based on actual experience over the past several years, about how often is this activity conducted? 3/yr
3. Operations/Construction areas covered: Operations, Engineering Support, Maintenance, Radiological Protection, Security, Training, Fire Protection, QA, Procurement, etc.
4. Extent of the activity (how many people, for how long) Approximately 8-10 inspectors on-site for typically 10 work-days
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 828 hr/yr (number involved) 6
 - b. Plant Manager 90 hr/yr
 - c. Corporate Department Heads 188 hr/yr (number involved) 5
 - d. Corporate Vice Presidents 330 hr/yr (number involved) 4
 - e. Chief Nuclear Officer 80 hr/yr
 - f. Other Plant Managers
and Supervisors 5471 hr/yr (number involved) 28

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC other (e.g., Region, Resident, Headquarters)
2. Based on actual experience over the past several years, about how often is this activity conducted? 10/yr plus Residents
3. Operations/Construction areas covered: Operations, Engineering Support, Maintenance, Radiological Protection, Security, Training, Fire Protection, QA, Emergency Plan, IST, ISI, Procurement, Health Physics, Chemistry, etc.
4. Extent of the activity (how many people, for how long) Approximately 1-2 inspectors on-site for typically 5 work-days plus continuous presence of 2 Resident Inspectors
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 1160 hr/yr (number involved) 6
 - b. Plant Manager 110 hr/yr
 - c. Corporate Department Heads 450 hr/yr (number involved) 5
 - d. Corporate Vice Presidents 450 hr/yr (number involved) 4
 - e. Chief Nuclear Officer 70 hr/yr
 - f. Other Plant Managers
and Supervisors 5544 hr/yr. (number involved) 28

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO Evaluations
2. Based on actual experience over the past several years, about how often is this activity conducted? Once per 18 months (= .67/yr)
3. Operations/Construction areas covered: Operations, Maintenance, Training, Chemistry, Health Physics, Engineering, Organization and Administration, Emergency Preparedness
4. Extent of the activity (how many people, for how long) Approximately 10-15 inspectors on-site for typically 10 work-days
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 888 hr/yr (number involved) 6
 - b. Plant Manager 80 hr/yr
 - c. Corporate Department Heads 160 hr/yr (number involved) 4
 - d. Corporate Vice Presidents 160 hr/yr (number involved) 4
 - e. Chief Nuclear Officer 80 hr/yr
 - f. Other Plant Managers and Supervisors 6407 hr/yr (number involved) 28

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Insurers (e.g., ANI)
2. Based on actual experience over the past several years, about how often is this activity conducted? 6/yr
3. Operations/Construction areas covered: Boiler Machinery, Liability, Property, Fire Protection, Analysis of water and oil, Training
4. Extent of the activity (how many people, for how long) Approximately 1-3 inspectors on-site for 1-5 days
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 266 hr/yr (number involved) 4
 - b. Plant Manager 4 hr/yr
 - c. Corporate Department Heads - (number involved) -
 - d. Corporate Vice Presidents 30 hr/yr (number involved) 4
 - e. Chief Nuclear Officer 5 hr/yr
 - f. Other Plant Managers and Supervisors 129 hr/yr (number involved) 15

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: EPA
2. Based on actual experience over the past several years, about how often is this activity conducted? 2/yr
3. Operations/Construction areas covered: Asbestos
4. Extent of the activity (how many people, for how long) Typically one inspector on-site for one day
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 35 hr/yr (number involved) 3
 - b. Plant Manager -
 - c. Corporate Department Heads - (number involved) -
 - d. Corporate Vice Presidents - (number involved) -
 - e. Chief Nuclear Officer -
 - f. Other Plant Managers and Supervisors - (number involved) -

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: OSHA
2. Based on actual experience over the past several years, about how often is this activity conducted? 8/yr
3. Operations/Construction areas covered: Personnel Safety, Asbestos
4. Extent of the activity (how many people, for how long) Typically one inspector on-site for 1/2 - 1 day
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 86 hr/yr (number involved) 2
 - b. Plant Manager 1 hr/yr
 - c. Corporate Department Heads - (number involved) -
 - d. Corporate Vice Presidents 20hr/yr (number involved) 2
 - e. Chief Nuclear Officer 5 hr/yr
 - f. Other Plant Managers and Supervisors - (number involved) -

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: State Dept.s of Health and Environmental Conservation
2. Based on actual experience over the past several years, about how often is this activity conducted? 2/yr
3. Operations/Construction areas covered: SPDES Permit, Plant Discharges, Laboratory Certification
4. Extent of the activity (how many people, for how long) Typically one inspector on-site for 3 work-days
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 48 hr/yr (number involved) 1
 - b. Plant Manager -
 - c. Corporate Department Heads - (number involved) -
 - d. Corporate Vice Presidents 18 hr/yr (number involved) 2
 - e. Chief Nuclear Officer -
 - f. Other Plant Managers and Supervisors 10 hr/yr (number involved) 1

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC - Required Quality Assurance
2. Based on actual experience over the past several years, about how often is this activity conducted? 20/yr
3. Operations/Construction areas covered: Operations, Maintenance, EQ, Surveillance and Testing, Fire Protection, Security, Emergency Plan, Health Physics, Procurement, Training, Radiological Protection
4. Extent of the activity (how many people, for how long) Typically 1-2 inspectors for one day or a small team of 2-5 inspectors for 5-15 work-days
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 810 hr/yr (number involved) 6
 - b. Plant Manager 60 hr/yr
 - c. Corporate Department Heads 200 hr/yr (number involved) 5
 - d. Corporate Vice Presidents 120hr/yr (number involved) 4
 - e. Chief Nuclear Officer 20 hr/yr
 - f. Other Plant Managers
and Supervisors 1540 hr/yr (number involved) 28

Con Edison
Indian Point Unit 2

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Required Self-Assessments
2. Based on actual experience over the past several years, about how often is this activity conducted? Routine monthly or quarterly assessments in certain areas plus 1-4/yr. of special nature
3. Operations/Construction areas covered: Engineering Support, Chemistry, Maintenance, Radiological Protection
4. Extent of the activity (how many people, for how long) Typically one inspector for 2-5 work-days for routine assessments and typically about 5 inspectors for 5-10 work-days for special assessments.
5. Approximate total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 219 hr/yr (number involved) 6
 - b. Plant Manager 60 hr/yr
 - c. Corporate Department Heads - (number involved) -
 - d. Corporate Vice Presidents 70 hr/yr (number involved) 4
 - e. Chief Nuclear Officer 20 hr/yr
 - f. Other Plant Managers
and Supervisors 1952 hr/yr (number involved) 28