

Stephen B. Br
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
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November 7, 1989

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

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

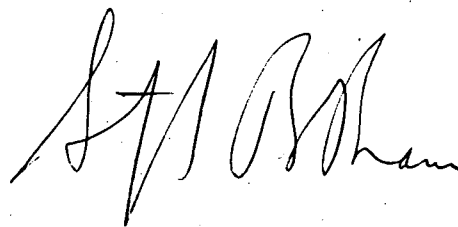
SUBJECT: NRC Bulletin No. 88-10, Supplement 1: Nonconforming Molded-Case
Circuit Breakers

By letter dated April 3, 1989, we responded to NRC Bulletin No. 88-10, "Nonconforming Molded-Case Circuit Breakers". Supplement 1 to that bulletin, issued August 3, 1989, required a review of the April 3 response to verify that it met the bulletin provisions as clarified by the supplement.

We have completed our review and have determined that a supplement to our original response is required. The Attachment to this letter contains our supplemental response to NRC Bulletin No. 88-10.

This response is being provided pursuant to Section 182a, Atomic Energy Act of 1954, as amended. Should you or your staff have any questions, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



Attachment

Subscribed and sworn to
before me this 7th day
of November, 1989.


Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 50403659
Qualified in Westchester County
Term Expires 9/30/91

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cc: Mr. William Russell
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
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Mr. Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
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US Nuclear Regulatory Commission
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Senior Resident Inspector
US Nuclear Regulatory Commission
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ATTACHMENT

SUPPLEMENTAL RESPONSE TO NRC BULLETIN NO. 88-10
"NONCONFORMING MOLDED-CASE CIRCUIT BREAKERS"

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
NOVEMBER, 1989

SUPPLEMENTAL RESPONSE TO NRC BULLETIN NO. 88-10

Reporting Requirement 1

All holders of operating licenses are required to provide a written report by April 1, 1989, that:

- a. Confirms that only molded-case CBs [circuit breakers] that meet the criteria of item 7 of the actions requested are being maintained as stored spares for future use in safety-related applications.
- b. Summarizes the total number, manufacturer, model number, and to the extent possible the procurement chain of those CBs that could not be traced to the CBM [circuit breaker manufacturer] in items 1 and 4 of the actions requested. For installed CBs, also identify each system in which they are/were installed. If item 4 of the actions requested has not been completed by April 1, 1989, due to the schedule for tests in item 3 of the actions requested, this information should be updated within 30 days of the completion of item 4 to address those additional CBs that could not be traced to the CBM.
- c. Confirms that items 1, 2, 3, 4, 5, 6, and 7 of the actions requested have been completed or will be implemented as requested.

Response to 1a:

Item 7 of the actions requested states that, with the exception of actions taken in response to items 3 and 5 of the actions requested, molded-case CBs installed in safety-related applications after August 1, 1988 should be manufactured by and procured from a CBM under a 10 CFR 50, Appendix B program; or, procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related use by the licensee or others using an acceptable dedication program.

In our previous response, dated April 3, 1989, we reported there were a total of 33 safety-related CBs being maintained as stored spares. All of these had been traced to their corresponding CBM, each a Con Edison approved vendor. The approval process was consistent with the applicable provisions of 10 CFR 50 Appendix B and Regulatory Guides 1.33 and 1.123; vendor's quality assurance organizations and programs were approved by Con Edison Quality Assurance.

Supplement 1 provides more restrictive traceability requirements. As stated in NRC Position No. 7:

"All safety-related CBs from the same procurement order are considered traceable provided that 1) the order was procured directly from a CBM having a quality assurance program in accordance with 10 CFR Part 50, Appendix B, 2) the CBM has been audited by the addressee in accordance with Appendix B, 3) the CBs were ordered as safety-related, and 4) documented evidence has been furnished to the addressee, such as a certificate of compliance. However, if safety-related CBs were procured from a vendor other than the CBM, a certificate of compliance by itself is not considered an adequate basis for establishing traceability. In such cases, traceability of individual procurement orders should be established through the review of procurement or shipping records back to the CBM. Telephone discussions with the CBM or vendor are not acceptable for establishing a basis for traceability. Traceability to a warehouse facility controlled by the CBM is considered equivalent to traceability to the CBM."

As a result of this new criterion, of the 33 safety-related CB spares reported previously, 16 are not considered traceable. These have been placed on material hold until traceability per the new criterion can be established. The 16 CB spares will not be used in safety systems at Indian Point if traceability cannot be obtained.

Response to 1b:

For item 1 of the actions requested, our sample is comprised of all safety-related CBs purchased prior to August 1, 1988 and being maintained as stored spares (quantity 33), plus all safety-related CBs purchased between August 1, 1983 and August 1, 1988 that have been installed (quantity 18). The 16 of 33 spare CBs that have not yet been traced per the new criterion 7 are as follows:

<u>Quan.</u>	<u>Manufacturer</u>	<u>Model No.</u>	<u>Procurement Chain</u>	<u>Year Rec'd</u>
3	Westinghouse	EHB 3100	Westinghouse to Solidstate Control to Con Edison	1979
3	Westinghouse	DA 2350	Westinghouse to Solidstate Control to Con Edison	1979
2	ITE	P1515	ITE to Associated Wholesale Electric Company (La Mirada, CA) to COMSIP, Inc. (Whittier, CA) to Con Edison	1987
2	Klockner Moeller	NZM6B-63/ ZM6-0.6-5- OBI-CNA	Klockner Moeller to Con Edison	1985
2	Klockner Moeller	NZM6B-63/ ZM6C-4/8- CNA	Klockner Moeller to Con Edison	1985
3	Westinghouse	4990D03G31	Westinghouse to Con Edison	1978
1	Klockner Moeller	NZMH6-63/ ZM6A-15-NA	Klockner Moeller to Con Edison	1986

We are continuing efforts to establish traceability of these CBs, especially for the CBs procured directly from a CBM. Any CB whose traceability cannot be obtained will not be used in safety systems at Indian Point.

Since 31 percent (16 of 51) of our sample has not been traceable per the new criterion 7, item 4 of the actions requested is now applicable to us. Item 4 states that if less than 80 percent of the CBs are traceable to the CBM per item 1, then the addressee should identify all CBs that have been purchased between August 1, 1983 and August 1, 1988, and installed in safety-related applications as replacements or installed during modifications, and verify their traceability.

As previously reported in our submittal dated April 3, 1989, only 18 safety-related CBs were purchased between August 1, 1983 and August 1, 1988 and installed. They were installed in one modification and they are part of our total sample of 51 CBs. These 18 CBs are traceable per the new criteria.

Response to 1c:

At this time, commercial grade CBs are not upgraded for use in safety-related applications at IP-2. There were a total of 33 safety-related CBs being maintained as stored spares at the time of our original response. Another 18 safety-related CBs purchased between August 1, 1983 and August 1, 1988 were installed in one modification. No other safety-related CBs purchased in that time period were installed by modifications. Additionally, no safety-related CBs purchased in that time period were installed as replacements. Our total sample is 51 CBs, 33 from stored spares and 18 from the one modification. Of the 33 spare CBs, 16 are not yet traceable per the Supplement 1 criterion 7. All 18 installed CBs are traceable. Therefore, item 1 of the actions requested has been completed, and item 2 of the actions requested (JCO for untraceable installed CBs) is not applicable.

Item 3 of the actions requested states that addresses who identify 80 percent or more CBs traceable to the CBM per item 1 should test the CBs that are not traceable to the CBM. Since only 69 percent of our sample is traceable, this item is not applicable.

All 18 CBs that were purchased between August 1, 1983 and August 1, 1988, and installed in safety-related applications as replacements or installed during modifications are traceable to the CBM. Therefore, item 4 of the actions requested has been completed, and item 5 of the actions requested (replace or test untraceable installed CBs) is not applicable.

The information generated while performing the actions requested in item 1 is documented and will be maintained for a period of 5 years, as set forth in item 6 of the actions requested.

In regard to item 7 of the actions requested, Con Edison will procure CBs per the requirements stated and as clarified by the supplement.

Reporting Requirement 2:

All holders of operating licenses are required to submit a report that summarizes available results of tests conducted in accordance with items 3 and 5 of the actions requested within 30 days after startup from the first and second refueling outages beginning after March 1, 1989. For CBs that pass these tests, the only information required is the number, manufacturer, model number, and to the extent possible the procurement chain of CBs tested (summary report format is acceptable). For CBs that fail these test(s), these reports should indicate the test(s) and the values of test parameter(s) at which the failure(s) occurred, as well as the corresponding manufacturer, model number, and to the extent possible, the procurement chain.

Response to 2:

As stated in the Response to 1c, items 3 and 5 of the actions requested are not applicable, therefore, this reporting requirement is not applicable.

CI-250 SUMMARY SHEET

I. Comment/Resolution: To be filled in by assigned licensing engineer.

S. Bram (Vice President, Nuclear Power):

See marked-up copy

C. Durkin (Vice President, Central Engineering):

See marked-up copy

B. Brandenburg (Assistant General Counsel):

See marked-up copy

J. Del Percio (Manager, Regulatory Affairs):
C. Jackson

See marked-up copy

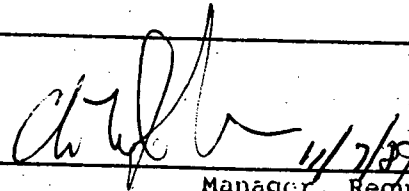
Other (List):

F. Phillips — See marked-up copy

D. Ghash — See marked-up copy

J. Lucashuk — No comments returned

II. Approval:

 11/7/89
Manager, Regulatory Affairs

Date forwarded to Vice President for Signature:

11/7/89