

John D. O'Toole
Vice President

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

October 28, 1981

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

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Brunner:

This refers to I.E. Inspection 50-247/81-14, conducted by Mr. J. Kottan on June 15-18, 1981 at Indian Point Nuclear Generating Station, Unit 2, of activities authorized by NRC License No. DPR-26. Your September 18, 1981 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed therewith as Appendix A. Our response is presented in Attachment A to this letter.

Based on discussions between your Messrs. T. Rebelowski and T. Kenny and our Mr. K. Burke, this response is being submitted at this time.

This response is being provided pursuant to Section 182 of the Atomic Energy Act of 1954, as amended. Should you or your staff have any questions, please contact us.

Very truly yours,



Subscribed and sworn to
before me this 28 day
of October, 1981.

(L. Love) *ave*
Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1983

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cc: Mr. T. Rebelowski, Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

ATTACHMENT A

Violation A

Appendix B, Environmental Technical Specifications, Section 5.4.1, states that detailed written procedures shall be prepared, approved and adhered to for activities involved in releases of radioactivity from the site. Administrative Directive No. CAD 3, Quality Control of Chemical and Radiochemical Analysis, requires that spiked Sr-89 and Sr-90 samples be sent to the licensee's contracting laboratory which performs Sr-89 and Sr-90 effluent analyses on at least a quarterly basis.

Contrary to the above, spiked Sr-89 and Sr-90 samples were not sent to the licensee's contracting laboratory for all of 1980 and the first quarter of 1981.

This is a Severity Level V Violation (Supplement I).

Response

Administrative directive CAD-3 "Quality Control of Chemical and Radiochemical Analyses" was reviewed and will be revised to provide sufficient administrative control to ensure that reference spiked samples are sent to our contractor laboratory at the required frequency.

A Sr-90 spiked sample has been prepared and sent to the laboratory for analysis. An N.B.S. traceable Sr-89 standard has been ordered. Since the Company supplier prepares such standards each calendar quarter, the first standard will be received during the first calendar quarter of 1982. Upon receipt of this standard, a spiked sample will be prepared and sent out for analysis.

It is anticipated that full compliance with be effected by March 31, 1982.

Violation B

Appendix B, Environmental Technical Specifications, Section 5.4.1, states that detailed written procedures shall be prepared, approved and adhered to for activities involved in releases of radioactivity from the site.

Contrary to the above, at the time of this inspection, the licensee possessed no procedure for compositing liquid radwaste samples for releases of radioactivity including volumes to be composited and the method of adding sample preservatives.

This is a Severity Level VI Violation (Supplement I).

Response

The detailed procedure for preparing composite samples was issued, in written form on a routine basis as part of the daily assignment sheet. Procedure IPC-S-020 "Radiochemical and Chemical Sample Preparation Prior to Discharge" was revised on June 23, 1981 to incorporate the information required for preparation of the composite samples. Procedure IPC-S-020 is now in effect and being used.

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