

John D. O'Toole
Vice President

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

November 23, 1981

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

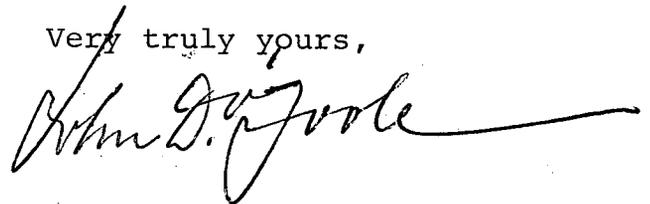
Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Brunner:

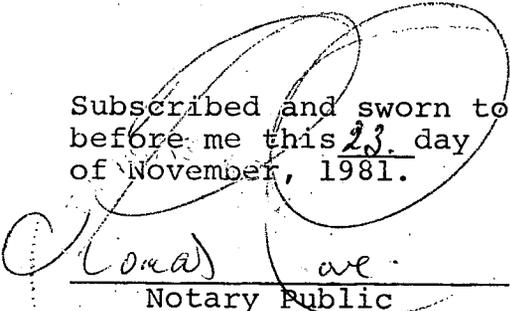
This refers to I.E. Inspection 50-247/81-19, conducted by Mr. T. Rebelowski, Senior Resident Inspector, on September 1-30, 1981, of activities authorized by NRC License No. DPR-26 at Indian Point Station. Your October 22, 1981 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements, as set in the Notice of Violation enclosed therewith as Appendix A. Our response is presented in Attachment A to this letter.

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 23 day
of November, 1981.



Notary Public

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

8201120959

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

ATTACHMENT A

Violation

Technical Specification 6.8.1 states, in part, "Written procedures and administrative policies shall be established, implemented and maintained..."

Station Administrative Order (SAO) No. 116, Housekeeping Policy, Revision 1, March 27, 1981, defines station policy regarding housekeeping. The stated intent of the SAO is to prescribe station implementation of ANSI N45.2.3-1973 and ANSI 18.7-1976, Paragraph 5.2.10, Housekeeping and Cleanliness Control. Referenced are practices and procedures for controlling (1) radiation zones, and (2) work activities, conditions, and environments that can affect the quality of important parts of the nuclear plant. Also referenced are Con Edison General Rules and Regulations, Section I, which calls for neat and orderly work practices by all employees.

SAO 116, Section II, Action Required, Item A General, states, "Housekeeping encompasses all activities related to (1) control of plant cleanliness, including materials, equipment, and disposal of combustible material, and debris for fire prevention/protection; (2) radioactive contamination control and storage of access to areas for these proposes." Item B specifies the station housekeeping control procedures and methods.

Contrary to the above, during a tour of the valve gallery, pipe penetration area, and containment spray pump area in the Primary Auxiliary Building on October 1, 1981, the following conditions were identified:

- Accumulations of dirt and debris throughout the areas;
- Various articles of protective clothing strewn throughout the areas;
- Large bags of waste lying about identified as radioactive waste;
- An improperly setup radiation control area;
- A number of overhead lights dangling from the wires which connect them; and,
- Tools and equipment carelessly strewn about.

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

Response

At the time of the NRC inspection of the Primary Auxiliary Building, extensive construction work was underway in the valve galley, pipe penetration and containment spray pump areas. The deficiencies in plant cleanliness in those areas were attributable to these construction activities. Coincidentally with the NRC inspection, station management conducted an inspection. During that inspection, all work permits authorizing work in these areas were revoked. The work in these areas was suspended until the areas were cleaned. In addition, meetings were held with Con Edison and contractor personnel to emphasize the importance of adequate housekeeping and cleanliness. The immediate corrective actions have provided an acceptable level of cleanliness in the station, even though significant construction activities continue.

In order to provide additional assurance that station housekeeping is maintained at an acceptable level, the existing program for maintaining plant cleanliness within the radiation controlled areas has been strengthened. The policy of revoking work permits in those areas where cleanliness has not been maintained continues. In addition, responsibility for inspecting and cleaning portions of the controlled area have been specifically delegated to plant personnel.

An Administrative Directive (RP-D-4) for the Radiation Protection Section at Indian Point describing the "Radiological Control Evaluation Program", provides for controlled area inspections on a daily basis with written reports to the Radiation Protection Manager and the Radwaste General Supervisor. As a result of this incident, the Radiation Protection Manager issued a written directive to Health Physics Supervisors specifically setting forth the responsibility for assuring compliance with the Administrative Directive. Particular attention will be addressed in those areas where extensive construction or modifications to the plant are in progress. These inspections shall include housekeeping items in addition to radiological controls. Instructions also have been issued which will preclude continued work if items such as those identified in the subject inspection report are found and not corrected in a timely manner.

In addition, the Radwaste General Supervisor has assigned responsibility to individual Supervisors within his section for housekeeping in specific areas of the Controlled Area to enforce those inspections referred to above. Within the Radwaste/Decontamination Section, a dedicated work force has been established whose sole function is to correct housekeeping deficiencies within the controlled area.

We believe that the specific delegation of responsibility to inspect the controlled area for potential housekeeping deficiencies and the

We believe that the program to revoke work permits in those areas where housekeeping is unacceptable along with the specific delegation of responsibility to inspect the controlled area for potential housekeeping deficiencies and the creation of a special work force to promptly address these deficiencies provide sufficient assurance that the conditions identified in the NRC inspection report will not recur.

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