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May 21, 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 Inspection Report 50-247/90-07

This is in response to your letter dated April 19, 1990 concerning inspection No. 50-247/90-07 conducted by Mr. Robert R. Temps from March 12, 1990 to March 16, 1990.

The attachment to this letter constitutes our response to the Notice of Violation transmitted in the subject Inspection Report as Appendix A. We acknowledge your determination that the administrative review and approval of certain temporary changes to procedures PT-V11A and PT-Q10 were incomplete. In the attached response we have outlined the actions taken to verify the correctness of the affected surveillance procedures and to assure proper administrative review in the future. The attachment also provides an assessment, as requested in your letter, as to why the procedural deviations referenced in the Notice were not identified during the routine review process.

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,



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PDC

TEO/111

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MAY, 1990**

RESPONSE TO NOTICE OF VIOLATION

Violation

The Notice of Violation in Inspection 90-07 is stated as follows:

As a result of the inspection conducted March 12 through 16, 1990, and in accordance with the "General Statement of Policy for NRC Enforcement Actions", 10 CFR Part 2, Appendix C, (Enforcement Policy) (1989), the following violation was identified.

Indian Point Unit 2 Technical Specification (TS) 6.8.1 and Station Administrative Order (SAO)-113, state in part, that procedures shall be followed, and that if procedures cannot be performed in accordance with approved procedures, a procedure change shall be made as specified in SAO-102, "Procedure/Procedure Change Approval Policy".

Contrary to the above, on March 14 and 15, 1990, the following changes were made to the below listed procedures without the necessary administrative review and approval:

- 1) Steps 3.15, 16, 17, 24, 25 were "X"ed out and not performed during the performance of surveillance procedure PT-V11A, Rev. 12, Reset of Overtemperature and Overpower Delta T Parameters.
- 2) On the data table for Enclosure A of PT-V11A, unauthorized changes were penciled in which required lifting of electrical leads in a manner inconsistent with proper administrative controls.
- 3) Procedural steps 3.4.4, 3.6.4 and Table 3.4 and 3.5 of procedure PT-Q10, Rev. 10, Rod Insertion Limit Computer, contained numerical acceptance criteria which were changed during the performance of the procedure.

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

Response to Notice of Violation

The identified modifications to the two tests (Procedures PT-V11A, Rev. 12 and PT-Q10, Rev. 10) were made without the necessary administrative review required by our Temporary Procedure Change practice. These modifications will be incorporated into the procedures by revision process prior to next use.

As a result of our investigation of this matter, we have concluded that the main contributing factor to the violation was a lack of thorough understanding of the temporary procedure change process by the technicians involved. We also concluded that ambiguities in the procedure also contributed to the belief that approval existed for the option used. The following corrective actions have been implemented to preclude further occurrences and to ensure future programmatic compliance.

- A) The surveillance procedures affected by stretch modifications were reviewed to determine the existence of additional concerns, and minor corrections were made. A subsequent NRC inspection (No. 50-247/90-09 on March 27-29, 1990) reviewed the results and found no additional concerns.
- B) A training session has been conducted with all instrument and control technicians and supervisors on procedural adherence and the temporary change procedure.
- C) The surveillance test instruction sheet has been revised to indicate that procedures must be performed exactly as written unless an approved Temporary Procedure Change is used.
- D) The ambiguities in procedure PT-V11A have been rectified. All other surveillance tests are being reviewed and rewritten to include human factor upgrade as part of the biennial review process. This project was started in January 1990 and approximately 100 tests have been upgraded. All tests will be upgraded by December 1992.

Based on the above, we believe that full compliance has now been achieved.

Response to Request for Assessment

After implementation, test procedures are reviewed and signed by the cognizant supervisor, the Senior Watch Supervisor (SWS), the Operations Manager if required, and the Test Engineer.

Assurance of strict procedural compliance is not the primary intent of this routine review process. Each review is intended to accomplish a specific purpose. The review by the cognizant supervisor is to assure that the test is complete and the results accurately reported. The review by the SWS is to verify that the reported results meet the operability criteria. If the operability criteria are not met, then the Operation Manager's review assures his awareness of the inoperable condition. Finally, the Test Engineer's review assures that the final conditions are satisfactory. This review process is not the mechanism by which procedural compliance is assured.

We believe that procedural compliance is a complex achievement requiring personnel motivation and attention to detail as well as high quality procedures and an efficient mechanism for obtaining needed changes.

Items B and C above are measures that have been taken to enhance personnel and supervisory sensitivity to the need for procedural compliance. Additional measures are being evaluated and will be incorporated as appropriate into the procedure upgrade process described in item D above. This aspect of the procedure upgrade will include changes intended to facilitate procedural compliance. As stated above, the surveillance procedures will be reviewed, and upgraded as determined appropriate, by December 1992.