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Vice President

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June 25, 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 50-247/90-08

This is in response to your letter dated May 24, 1990, concerning the routine safety inspection conducted by Mr. Leonard J. Prividy and Mr. Donald L. Capton to resolve the findings of the special maintenance team inspection No. 50-247/89-80.

The attachment to this letter constitutes our response to the Notice of Violation attached as Appendix A to your letter.

Should you have any questions, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
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King of Prussia, PA 19406

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 90-08

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

Response to Notice of Violation

Violation

The Notice of Violation in Inspection Report 90-08 is stated as follows:

As a result of the inspection conducted from March 12 to March 16, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the following violation was identified:

- A. Indian Point Unit 2 Technical Specification 6.8.1 requires that written procedures shall be established and implemented per Sections 5.1 and 5.3 of ANSI N18.7-1972. Section 5.3.5(2) of ANSI N18.7-1972 states in part that "maintenance procedures should contain enough detail to permit the maintenance work to be performed safely..."

Licensee Procedure No. QA-751-2 "Inspection of Welding" includes a standard inspection requirement for quality control (QC) personnel to check the orientation of items by referring to drawings or sketches at the time of joint fit-up.

1. Contrary to the above, as of March 12, 1990, Work Order NP-88-38646, Minor Modification No. MFI-88-01854-M, and Maintenance Modification Implementation Procedure No. MMI 11.58 for the installation of the MS-55 valves did not specify the correct orientation of the valves regarding flow. As a result valve MS-55A was installed in a direction opposite to that required by the design.
2. Additionally, QC personnel involved with the inspection activities for the installation of the MS-55 valves did not check the valve orientation in accordance with Procedure No. QA-751-2.

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

Response

Immediate corrective actions were taken as described on page 7 of the Inspection Report and documented in an Open Item Report (90-03-051) initiated during the inspection. In summary:

- o after discussions with the vendor and considering the particular application, the as-installed configuration of valve MS-55A was determined to be acceptable;

- o Quality Control inspectors were re-instructed during the course of the inspection on the requirement in Procedure No. QA-751-2 for verifying component orientation during joint fit-up and prior to welding;

Longer term corrective actions were identified in the Open Item Report and have since been implemented. These are:

- o Planners have been instructed to include steps in work packages for verification of flow direction of valves;
- o Maintenance supervisors have been instructed on the requirement to verify valve orientation during installation.

Modification documents normally do indicate flow direction for a valve when a specific orientation is critical. This information then becomes part of the work order package that controls installation. In this particular case, since a gate valve was involved, engineering did not consider flow direction to be a factor and did not specify component orientation in the modification. Further, in preparing the work order package, the planner normally incorporates the vendor's installation instructions into the work step list. In this instance, the vendor did not indicate the need for a particular orientation of the valve.

Even though not specified in the work order package, the installing organization would be expected to question engineering on the proper orientation if a flow arrow is marked on a valve. The flow arrow on this particular valve is vibro-edged on, is not easily discernible, and was apparently unnoticed by the installers.

As a final check, the Quality Control inspector would be expected to raise a concern during joint fit-up in accordance with Procedure No. QA-751-2 if orientation is not readily discernible from the information available. The Quality Control inspector involved in this instance was knowledgeable of the requirement for verification of valve orientation and appears to have made an error that could be considered an isolated occurrence. Since the work involved a gate valve where orientation is normally not a consideration, the work order package documents did not specify flow direction, and the flow arrow on the valve was not highly visible, it is unclear whether such a verification, if performed, would have discovered the reverse installation.

It should be noted that the vendor has indicated that the valve used in this installation is pressure tested after fabrication to verify that the required leakage rate can be met with pressure applied on either side of the disc. According to the vendor, installation in the direction of the flow arrow is recommended for ease of operation only and is not required by the design for the proper functioning of the valve in service.

We believe that our existing procedures and methods for work control discussed above would normally have precluded this occurrence. To provide still additional assurance, we plan the following additional actions:

- o Evaluation of the need to enhance the present engineering practice on design modification information as related to valve orientation with respect to flow direction;
- o All work order packages involving valve installation will include instructions to indicate and ensure proper valve orientation relative to flow direction;
- o Quality Assurance engineers and Quality Control inspectors will be instructed to verify that work order packages involving valve installation include instructions that indicate and ensure proper valve orientation relative to flow direction.

We recognize the importance of installing valves correctly and performing maintenance work safely. Con Edison is committed to continually improving the reliability and safety of Indian Point Unit No. 2. We strive for excellence in all areas of plant operation and maintenance and we believe the corrective actions described herein will enhance the pre-existing methods and contribute to the prevention of a recurrence of this kind.