Stephen B. Bram
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
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Telephone (914) 737-8116

August 23, 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 50-247/90-13 Notice of Violation

This is in response to your letter dated July 24, 1990, concerning the routine inspection conducted by Messrs. G. Hunegs, H. Kaplan, P. Kelly and D. Lew from May 7, 1990 to June 10, 1990.

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

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,

S B Bram

Attachment

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

Mr. Donald S. Brinkman, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
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Buchanan, NY 10511

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ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 90-13

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

RESPONSE TO NOTICE OF VIOLATION

NOTICE OF VIOLATION

The Notice of Violation in Inspection Report 90-13 is stated as follows:

> During an NRC inspection conducted from May 7, 1990 to June 10, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, 53 Fed. Reg. 40019 (October 13, 1988 Enforcement Policy), the following violation was identified:
>
> > Indian Point Unit 2 Quality Assurance Program, Attachment 1, Revision No. 7, and 10 CFR 50, Appendix B, Criterion V require, in part, that activities affecting quality shall be performed in accordance with documented instructions or procedures of a detail [sic] appropriate to the circumstances.
> >
> > Contrary to the above, on June 7, 1990, maintenance was conducted on the No. 21 service water pump strainer, an activity affecting quality, with a procedure which did not contain documented instructions or procedures of a detail appropriate to the circumstances.
> >
> > This is a Severity Level IV Violation. (Supplement I).

RESPONSE

The Indian Point Unit 2 Quality Assurance Program, Revision No. 7, and 10 CFR 50, Appendix B, Criterion V state, in part, that "activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures". Service water pump strainers at Indian Point Unit 2 occasionally experience high differential pressure due to accumulation of debris within the internal assembly. Typically, an inspection is performed using an investigative checklist (ICL) to assess the situation and if a problem other than the expected clogging is encountered, additional written instruction is obtained to perform repairs. Removal of the strainer cover, operating mechanism assembly, and internal assembly as a unit is required to conduct the inspection and is not considered disassembly.

For the maintenance activity in question, an inspection was necessary to determine the nature of the strainer problem and an investigative checklist was prepared to accomplish the task. During cover removal, the internal assembly came apart due to a failed retaining ring, and hence, an unplanned disassembly occurred. It was not intended to disassemble the internal assembly using the ICL. Therefore, it is our contention that the

maintenance on the strainer for No. 21 service water pump was conducted with documented instructions of a type appropriate to accomplish the task that was anticipated at the time of preparation of the work package, and, was consistent with the standards of work performance currently in place.

A procedure is required to enable reassembly of the internal assembly and repair of deficiencies identified during inspection. In this case, the proper procedure (MP 14.81) was obtained and reassembly of the internal assembly was accomplished in accordance with the procedure. Prior to reinstallation of the cover, a bent drive key on the operating mechanism assembly was discovered. The drive key was subsequently replaced, but a temporary procedure change was not processed to delete unnecessary preceding steps. Typically, a subassembly of the strainer is disassembled, inspected, repaired or maintained, and reassembled. The procedure is designed to accommodate this situation as the steps are presented in the sequence they would normally be performed. For this task, the operating mechanism assembly did not require disassembly and inspection, but only one component needed to be replaced. Therefore, the steps for disassembly, inspection and repair or maintenance were not physically required to allow for the replacement of the drive key. Therefore, this temporary procedure change was required due to the nature of this particular task and is not considered a deficiency in the procedure, as stated in the inspection report.

In our continuing efforts to enhance our maintenance program, the service water strainer procedure was recently rewritten to include removal of the cover, operating mechanism assembly, and internal assembly as one unit. Additionally, reflective of our attempt to proceduralize investigations, it is our intention to use the revised procedure to perform subsequent inspections of the strainers. However, this will not preclude the use of an ICL to accomplish an inspection.

The replacement of the drive key without the requisition of a temporary procedure change is contrary to Maintenance administrative directives and station administrative orders. Maintenance personnel have been reinstructed on the requirements of these documents.