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Vice President

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March 28, 1991

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 Notice of Violation, NRC Inspection Report No. 50-247/90-26

This letter is in response to the subject Notice of Violation transmitted to us by letter dated February 26, 1991. Our response is provided in the attachment to this letter.

On pages 12 and 13 of the inspection report, the NRC referred to LER 90-02. The inspector concluded that the LER was submitted late. Actually, 10 CFR 50.4(d) allows submittals that are due on a weekend or holiday to be submitted during the next work day as occurred in this case.

Should you have any questions regarding this matter, 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

Mr. Francis J. Williams, Jr., Project Manager
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Notice of Violation

A. Consolidated Edison's Quality Assurance Program Description, Rev. 7, Section 5.2.11, "Corrective Actions" and 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions" require, in part, that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on approximately January 2, 1989, an error in the procedure for setting an amptector for a safety-related breaker was identified but was not corrected. On July 27, 1989, the as-found setpoints for safety-related amptectors indicated deficiencies in amptector settings, however, these deficiencies were not identified nor corrected.

Response

Data sheets in connection with Surveillance Test PT-3Y5A contained incorrect information, and as a result several breaker amptector settings were set incorrectly. The incorrect data did not prevent any safety related equipment from performing its intended safety function.

Immediate corrective actions included the verification and correction, as needed, of all data sheets from the Surveillance Test PT-3Y5A, and verifications of all field amptector settings. Training sessions were also conducted with the technicians to heighten their awareness of gaps between as-found and as-left data readings. Also, the Test Engineers have been instructed on the importance of proper technical reviews and elimination of numerical errors when transposing information.

Subsequently, Surveillance Test PT-3Y5A received a comprehensive procedural upgrade review that resulted in a complete revision. All data sheets have been verified and are correct. The test requirements now specify a prompt check of each breaker setting as soon as completed. An operability evaluation has been added for each component rather than an overall test evaluation.

B. Technical Specification 6.6.1.b requires, in part, that each Licensee Event Report submitted to the Commission be reviewed by the Site Nuclear Safety Committee.

Contrary to the above, the following Licensee Event Reports for 1991 had not been reviewed by the Site Nuclear Safety Committee as of January 10, 1991:

LER No.	Date Submitted
90-02	May 29, 1990
90-05	August 30, 1990
90-06	September 12, 1990
90-07	September 24, 1990
90-09	October 26, 1990

Response

While these LERs had not, in fact, been reviewed by the Station Nuclear Safety Committee (SNSC) as of January 10, 1991, the technical specifications do not require this review to be conducted in any given time frame. In addition even though the LER's had not been reviewed, the events themselves had been reviewed by SNSC. Nevertheless, more timely review of LER's would be beneficial.

Immediate corrective actions included an investigation to determine any other LERs which had not yet been reviewed by SNSC. An unscheduled SNSC meeting was held to review these LERs. Direction was given to the Nuclear Safety and Licensing Staff to include tracking of the SNSC review of LERs on the Nuclear Commitment Tracking System. This practice has been been fully implemented and appears to be working well.

More formalized provisions for SNSC review of required reports will be incorporated into the appropriate Station Administrative Order by August 31, 1991.