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June 17, 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 Maintenance Reinspection Report No.  
50-247/91-80

This is in response to your letter dated April 12, 1991 concerning the special maintenance team inspection led by Mr. Leonard Prividy from January 9 to 18, 1991. We are very pleased that this revisit resulted in the resolution and closure of a majority of the open items identified during the first maintenance team inspection conducted in April and May of 1989. As you are aware, we have allocated substantial resources to our maintenance activities, and we are particularly pleased that this inspection reflected the progress we have made toward meeting our commitment to excellence in maintenance.

Several concerns were identified in Appendix 2 of the report on the reinspection and we were requested to notify you within 60 days of receipt of your letter of actions taken or planned to improve our maintenance activities in relation to those concerns. We were also requested to resolve one unresolved item. The attachment to this letter constitutes our response to these matters.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing.

Very truly yours,



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ATTACHMENT

Response to Maintenance Reinspection  
Report 50-247/91-80

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
JUNE, 1991

Response to Maintenance Reinspection Report 50-247/91-80

1. Appendix 2 of the inspection report identified six items for evaluation and corrective action as appropriate. The items and our corresponding responses are presented below.

- o No comprehensive document to describe walkdown inspections

As you noted, we currently have a number of material condition inspection programs in place. We believe that, in the aggregate, they provide a high level of detailed awareness of plant material conditions. The importance of these programs will be reinforced with the appropriate personnel with emphasis placed on the need for consistent implementation. We will also reassess our procedures and review successful industry material condition inspection programs in an effort to develop enhancements to our walkdown program and procedures that would improve our ability to identify deficiencies in material condition. We expect to complete this effort and implement any appropriate changes within the first quarter of 1992.

- o Several existing walkdown and material condition procedures were being implemented weakly

We expect that the actions discussed above will improve implementation of existing procedures as well as enhance the identification of deficiencies in plant material condition.

In the interim, the normal increase in testing, inspection, and system walkdowns associated with the completion of a refueling outage and return to service will address material conditions. In particular, as a result of the maintenance reinspection, attention was given to piping hangers during our current outage and a number of deficiencies have been identified, evaluated and corrected.

- o A weakness was noted in the maintenance decision process concerning the system engineer review of safety or technical specification significant items found during PM upgrade program reviews

This item is addressed in the response to the unresolved item.

- o Improve system engineer identification of equipment deficiencies

The program review discussed above in response to the first concern will also address this concern.

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- o Procedural weakness exists concerning use of non-calibrated instruments in surveillance procedures

Surveillance test procedures typically contain a precaution and limitation statement to use only test equipment calibrated in accordance with approved calibration procedures, and, a test equipment table that lists suggested equipment with entries required for serial number and next calibration due date or a pre-entered not applicable in each column. In this apparent isolated case, an ohmmeter used only for a continuity check in test procedure PT-M14B lacked the not applicable pre-entries. A temporary procedure change request was written for this test during the inspection period which deleted the precaution and limitation note and added not applicable entries to the test equipment table. These changes will be incorporated as a permanent change at the next biennial update of that procedure. Other procedures will be reviewed at their biennial review date to check for similar omissions.

- o Improve communications between operations and maintenance regarding equipment deficiencies

We were somewhat surprised at this potential problem because of the extensive efforts we have made to improve communications between the two organizations. There are numerous scheduled meetings to review work orders, schedules, equipment deficiencies, interface requirements, etc., and we believe these communications are effective.

We have reviewed the situation that led to this conclusion by the inspector and we believe, because of somewhat unusual circumstances, he may have misinterpreted the events. The operator conservatively questioned the importance of a deficiency tag prior to running the gas turbine for a non-critical test. Since it wasn't urgent and it was a weekend, the watch postponed the test to ensure good communications would occur between Operations and Maintenance before operating the equipment. Were it not a weekend or if it were essential to perform the test, this good communication check would have occurred immediately and the test would have been run, as it subsequently was. We believe that poor communications would have been demonstrated by the test being conducted in spite of any doubts on the part of the operator without an attempt to clarify the significance of the deficiency tag.

We strongly agree that knowledge of equipment deficiencies is essential and we will continue to stress the vital importance of good communications between Operations and Maintenance in our daily activities.

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2. Unresolved Item 91-80-01

As stated in the inspection report, "Although the licensee's PM upgrade program identified the need for PM of the vacuum breaker valves [on the sodium hydroxide tank for the containment spray system], no immediate operability readiness concern had been identified by the licensee's review. Failure of the PM review to question operability readiness of safety related components/systems identified as a result of the evaluation process appears to be a weakness... This matter is an unresolved item pending 1) review of the licensee's resolution of the vacuum breaker valve operability question and corrective action, 2) addressing procedural requirements to assure system engineers are required to initiate timely operability readiness determinations for newly identified PM program items and 3) providing training for system engineers to enable recognition of operability concerns and actions needed."

RESPONSE:

- 1) A calculation has been performed which demonstrates that a complete failure of the vacuum breakers would not have prevented the addition of the necessary amount of sodium hydroxide to containment spray. In addition, bench testing of the vacuum breakers was performed during this refueling outage which demonstrated that the valves function properly. Both the calculation and test results are available for review.
- 2) Technical Services Procedure TS-SQ-12.311, 'Preventive Maintenance Evaluation Program', will be revised by August 1, 1991 to require that the system engineers prioritize newly identified PM program items such that, for those of high priority, a prompt review will be conducted to determine the safety significance of the lack of preventive maintenance for the component.
- 3) As required by Technical Services Procedure TS-SQ-2.002, 'Review, Revision, Approval and Distribution of Technical Services Procedures', all affected personnel are required to be trained prior to implementation of revised procedures. Accordingly, the system engineers will receive instruction on the revisions to procedure TS-SQ-12.311 and we expect that the procedure will become effective by September 1, 1991.