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Vice President

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November 4, 1991

Re: Indian Point Unit No. 2
Docket No. 50-247

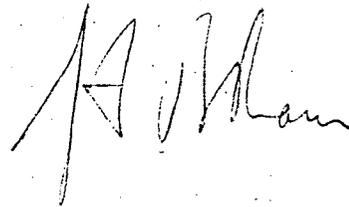
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SUBJECT: Response to Notice of Violation, NRC Inspection
Report No. 50-247/91-20

This letter is in response to the subject Notice of Violation transmitted to us by letter dated October 3, 1991. Our response is provided in the attachment to this letter.

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

Very truly yours,



Attachment

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

During an NRC inspection conducted from July 21, 1991, to August 31, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions" and Con Edison's Quality Assurance Program, Rev. 8, Section 5.2.11, "Corrective Actions" require, in part, that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the following conditions adverse to quality were not promptly identified and/or corrected:

1. From August 18, 1991 through August 30, 1991, numerous safety related cable trays material condition deficiencies were not promptly identified nor corrected. These deficiencies included flammable and conductive material, which frequently provided continuity across the barrier installed for channel separation.
2. On June 28, 1989; January 23, 1990; June 14, 1990; December 4, 1990 and June 3, 1991, a portion of transite barrier separating safety related cable trays was identified missing, but was not replaced.

This is a Severity Level IV violation (Supplement 1).

Reply to Notice of Violation

This violation occurred because field supervisory personnel did not maintain and verify the continuing effectiveness of work standards for cable tray maintenance and cleanliness which adequately reflect station operating procedures. A number of incidents of debris accumulating in cable trays were identified. Furthermore, our inspections revealed instances of insufficient attention by individuals performing work involving the removal of cable separation barriers that resulted in barriers not being properly reinstalled. These findings indicate a need for greater understanding by workers and field supervisors regarding the importance of the cable separation barriers and cable tray cleanliness. Additionally, the violation emphasizes the necessity to resolve such deficiencies in a timely manner once they have been identified.

As a result of this violation, cable tray inspections were accelerated and the deficiencies which resulted in this violation were corrected. Potential instances of inadequate or missing cable separation barriers were investigated and corrective actions are currently being assessed. Central Engineering is evaluating various acceptable cable separation barriers alternatives. It is expected that all necessary barrier replacement will be completed by November 21, 1991.

In order to preclude a recurrence of the conditions that led to this violation, the Radwaste Section has increased the cable tray inspection frequency from semiannually to once per month. Also, in order to improve personnel awareness of station expectations for cable tray material condition, a technical safety talk has been prepared for presentation to appropriate station personnel. This technical safety talk outlines the potential implications of inadequate cable tray maintenance and re-emphasizes cable tray maintenance practices. The importance of periodic cable tray inspection has also been re-emphasized to operations personnel.