

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

June 30, 1982

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

IE HQ FILE COPY

Mr. Richard W. Starostecki
SALP Board Chairman
Director, Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

Your letter of June 2, 1982 transmitted the NRC Region I Systematic Assessment of Licensee Performance (SALP) report dated May 24, 1982. The report assessed activities associated with Indian Point Unit No. 2 between March 1, 1981 and February 28, 1982.

Based on that report you requested that we inform you of actions Con Edison has taken or will take to improve the surveillance program and radiological control activities. These actions are described in Attachment A. Additionally, you indicated that we could include any comments we might have regarding the SALP report. These comments are contained in Attachment B.

If you have any questions concerning this response please contact me.

Very truly yours,



cc: Mr. Ronald C. Haynes,
Regional Administrator-Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Mr. T. Rebelski, Senior Resident Inspector
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ATTACHMENT A

SURVEILLANCE PROGRAM AND RADIOLOGICAL CONTROL ACTIVITIES

Surveillance Testing

Prior to receiving the SALP report Con Edison had recognized the areas in Surveillance Testing requiring improvement and had taken the following actions.

Improve Test Procedures

During the ongoing review of surveillance and test procedures all tests that have been found to contain deficiencies or require clarification have been or will be continued until all of the tests have been reviewed. As noted in the SALP report this included incorporation of ASME Section XI pump performance requirements. These were contained in a test program originally prepared and submitted to the Commission in 1977 but modified in a later submittal to the Commission in 1979. All pump surveillance tests have been revised to meet the commitments made in 1977.

Improve Test Follow-Up

Improved test follow-up has been initiated through the use of the following methods:

- 1) A delayed test status report is issued to Station management on a daily basis. This report indicates tests which have not been completed by the 3/4 point of the testing window.
- 2) A Test Resolution Report System is now in use. This system provides a formal mechanism for notification, follow-up and correction of discrepancies in test results.

Increase Staffing

Two additional Test Engineers have been hired. One started work June 1 and the second will be starting work in July. One of the immediate duties of the second Test Engineer will be to assist in the ongoing program of reviewing and rewriting surveillance tests. Other assigned responsibilities will include preparing new test procedures, evaluating test results and following up on resolution of unsatisfactory test results. An additional professional has been assigned to the Test Section to provide the resources necessary to prepare tests required for the forthcoming refueling outage. The use of these people will minimize the impact of the outage on the Test Engineers so that we can continue the review of surveillance tests.

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Training

As replacement technicians are assigned to the Test Section they are required to undergo an extensive training program prior to commencing testing activities. Training for technicians includes five weeks of formal classroom training involving plant systems, plant equipment, test procedures and use of test equipment. In addition, field training in plant systems and testing plant systems is conducted with the support of Operations. Operations personnel participate until Test and Performance technicians qualify to perform testing without Operation Support.

The Nuclear Training Section has instituted a five year training program for Station personnel. Promising technicians are sent to the Company's Assessment Center for evaluation of their capability to move up to supervisory capacity. Supervisors are given progressive training in supervision and management skills.

Radiological Control Activities

Con Edison has already taken action in the following areas to improve radiological control activities.

Radiation Protection

Several Health Physics Instructions (HPIs) and Procedures (HPPs) have been revised to include stringent controls on Con Edison and contractor personnel monitoring and Controlled Area access. HPI-4.17 now requires the submittal of reports to the General Manager, Environmental Health & Safety, for lost, off-scale, damaged, or modified dosimetric devices. These reports receive management review to provide a reasonable assurance of the proper assessment of individual dosimetric records and the need for retraining. Reports of lost dosimeters are compiled monthly and submitted directly to the Vice-President of Nuclear Power. HPI-2.25 has been revised to more clearly define the responsibilities of Security Guards regarding access and dosimetry control. HPP-2.1 has been modified to require dosimeter reading verification by Radiation Protection personnel for jobs where individual exposures greater than 300 mrem and group exposures greater than 5 man-rem are expected. As a further check, HPP-2.1 requires an audit of Supplementary Sign-In Sheets and Computer Sign-Outs. Compliance inspections have been established as a routine Radiation Protection function. The frequency of these inspections increases as a direct function of increases in the Control Area workload.

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To improve housekeeping, a formal program has been implemented to reduce the net square footage of contaminated area in both Units #1 and #2.

Radwaste Management and Transportation

Training is being given on a weekly basis by Con Edison and contractor management personnel to contractor decontamination technicians. In addition, bi-weekly training is being given by the Con Edison Nuclear Training Section. The training includes the rules and regulations of the NRC, U.S. and New York State DOTs and Indian Point. Radwaste and Radiation Protection procedures are reviewed and the contractors must pass knowledge retention tests after each training session.

Contractor decontamination/waste handling technicians are being more closely supervised with first and second line supervision reporting to Con Edison management.

A formal contaminated area reduction program has been instituted. A dedicated decontamination work force has been assigned to this project under the direction of an engineer. In addition to decontaminating specific areas, the contamination sources are being identified and reduced by procedural controls, engineering evaluation and follow-up, and MWR's for the elimination of mechanical leaks.

Controlled copies of all procedures dealing with the handling, packaging, processing and transportation of radioactive material are being maintained by the Radwaste Section. All personnel will continue to be instructed on the importance of procedure compliance.

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ATTACHMENT B

COMMENTS

Plant Operations

Con Edison's actions to maintain high standards in the conduct of plant operations involve all Nuclear Power departments and applicable corporate support organizations. The Company is working with the Institute of Nuclear Power Operations (INPO) to maintain or exceed INPO's good practices standards, which are set above minimum requirements.

The Nuclear Power Generation Department has recognized the need to increase the staff of the Operations Section. Action has been taken and is continuing in this direction. An Operations Staff Manager has been hired and additional staffing is planned. They will assist and report directly to the Chief Operations Engineer.

Operations has reemphasized the importance of administrative controls on control room drawings. As a supplement to present Company controls of drawings a revised Station Administrative Order is being prepared to further improve control of drawings for the control room.

Following an operational problem with the boron injection tank, Con Edison started a pilot project, which if successful, and carried beyond the pilot phase scheduled to conclude in July, would result in the review of approximately 50 plant systems and 350 procedures. The review will confirm that requirements of on the FSAR and Technical Specifications, as well as any other applicable commitments are incorporated in procedures. Where necessary, procedures would be revised, surveillance modified, and retraining conducted.

Licensee Event Reports

A substantial effort is being made to improve the quality of Licensee Event Reports. This includes conducting detailed investigations to determine root causes of significant events and preparing clear concise reports.

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Maintenance

Action has been taken by Nuclear Power to improve identification of safety-related equipment maintenance. Supervisors representing cognizant Nuclear Power sections, Power Generation Maintenance and Quality Assurance and Reliability meet daily to review Maintenance Work Requests. This management review includes identification of safety-related equipment maintenance. Additional Engineering documentation of identification of certain mechanical safety-related systems has been formally requested.

Action has been taken by the Maintenance Section to increase the number of permanent mechanics on the Staff. Several additional positions were budgeted and are in the process of being filled. A goal of Maintenance is to reduce the current backlog of Maintenance Work Requests to a 30-day inventory during the third quarter of 1982.

Fire Protection

Improvements in Indian Point 2's fire protection program are evident since the Fire and Property Protection Engineer joined the plant staff.

Procedures governing the fire protection program have been prepared and are being implemented. These procedures are presently being processed for formal adoption. The new procedures will provide the necessary methods for identification, tracking and correction of the types of deficiencies identified in the SALP report.

The Fire and Property Protection Engineer conducts daily inspections, prepares a Fire and Property Protection Inspection Report for items on non-conformance and specifies dates, where required or as appropriate, for completion of action to correct non-conformances. Progress of action to correct non-conformance is regularly reviewed to completion and is documented.

Emergency Preparedness

As reported in the SALP Con Edison has completed all but one of the improvement items identified during the Emergency Preparedness Appraisal conducted from May 11 to May 20, 1981. Only the back-up radio system intended to provide back-up radio communication among the Emergency Operations Centers (EOC) of Orange, Putnam, Rockland and Westchester Counties, the City of Peekskill, the State of New York and the

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Indian Point Emergency Control Center is not completed. Complete operation of the system is scheduled for August 15, 1982. This is contingent upon completion of redesign of radio communications with New York State due to limitations placed on a specific frequency already designated for state/county use.

Refueling

Action has already been taken to reduce the likelihood of major component failures during startup after the next refueling outage. In the current period before the refueling outage, and during the outage, an increased preventive maintenance and overhaul program is being implemented. In addition, analysis of trends in surveillance and performance testing is planned as an aid to detection of incipient equipment degradation.

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