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ENCLOSURE 4

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May 12, 1988

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

Mr. William Russell
Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

SUBJECT: Response to Systematic Assessment of Licensee Performance (SALP)

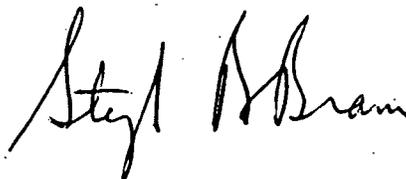
This letter provides a response to the issues identified both in the Systematic Assessment of Licensee Performance (SALP) report for IP-2 dated April 4, 1988 and at the April 12, 1988 meeting between Con Edison and the NRC, held to discuss the assessments presented in that report.

The SALP report covering the performance of activities at IP-2 for the period August 1, 1986 through February 7, 1988 has been reviewed. We acknowledge the report's assessments and concur with the SALP Board recommendations. Actions have been or will be taken in response to each of the specific recommendations, and with regard to the broader issues raised in the report.

Attachment A provides a brief discussion of our strategy and goals for improvement. It represents a general overview of our program to address issues identified in the SALP report. This improvement program is consistent with our 1988 Corporate Goals for Nuclear Power and Engineering. Attachment B specifically addresses further programs relating to the Engineering Support Functional Area. In addition, we will strive to further enhance our performance in areas that have already been identified as strong.

We are determined to correct weaknesses that have been identified. In order to best accomplish this to our mutual full satisfaction, Con Edison upper management, together with those middle managers who are responsible for various plant-related functional areas, plan to meet with appropriate NRC staff personnel to discuss our specific betterment programs. We would request and welcome feedback relating to our programs.

Very truly yours,



Attachment

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Q DCD

cc: Document Control Desk
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ATTACHMENT A

Strategy for Improvement

The goal of site and corporate management is to reaffirm throughout our nuclear organization that the highest priority for the operation of Indian Point Unit 2 is reactor safety, and to ensure that resources are effectively allocated to quickly and thoroughly identify, address and resolve potential safety issues. The initiatives listed below have either been implemented or are planned to be implemented in the near future in response to this goal.

1. A policy statement for Excellence in Operations is being developed with the full input and support of all levels of station management.
2. An operations planning group has been established to ensure adequate planning for activities controlled by the watch sections. This planning includes advanced development of contingency plans and review of required procedures and work permits to conduct the planned evolutions.
3. Increased emphasis is being placed on tracking commitments and corrective actions to ensure their timely and complete resolution. Responsibility and accountability for corrective action is being addressed at all levels within the management chain.
4. Increased emphasis has been placed on ensuring the adequacy of operating procedures and strict adherence to procedure.
5. Increased emphasis has been placed on ensuring proper communication. Particular attention has been placed on communication within the watch organization and between the watch organization and operations management.
6. A review of the Nuclear Power organization and the interface between Nuclear Power and Central Engineering is being conducted. Various organizational changes will be accomplished to streamline the management process, enhance personnel effectiveness and improve communications.
7. A System Engineer program is being implemented on site to provide a single individual as a point of contact for key plant systems. Each individual system expert will be cognizant of his/her assigned system. It is expected that this program will facilitate the conduct of design, operation, maintenance and testing of the systems and contribute to improved communications, responsibility and accountability for system performance among organizations.
8. The Chemistry area has been strengthened by increasing management involvement and oversight. A quality program is taking shape by realigning organization reporting, increasing the number of middle management personnel and specifically assigning an oversight function to a subcommittee of the Nuclear Facilities Safety Committee.

9. Radiation exposure reduction lessons learned from the past outage have been identified, reviewed and prioritized for applicability to the next three outages. Research and development efforts are also being taken to identify and determine the feasibility of additional means to reduce radiation dose.
10. The maintenance workload is being reviewed to reexamine those items with potential for safety-significance. High priority will be assigned to reducing this portion of the current maintenance workload.
11. A Design Basis Documentation program has been initiated to improve the completeness and retrievability of design basis information for key plant systems. It is expected that this effort will provide additional capability to ensure that potential safety issues will be properly addressed.

ATTACHMENT B

Introduction

In addition to initiatives listed in Attachment A, Con Edison has reviewed Section H (Engineering Support) of the SALP including the bases for the observations drawn therein. The following are descriptions of additional actions which have been implemented in our programs or are planned to be implemented in the near future to address these observations and board recommendations.

Engineering Support Improvement Actions

1. Design modifications are required to be presented to the Station Nuclear Safety Committee (SNSC). SNSC now requires the discipline engineer to personally make the SNSC presentation with key backup documentation to support the package. SNSC members will ascertain the safety basis of proposed changes and assure appropriate input and assumptions are well founded and properly documented thereby ensuring a thorough review of any potential safety issues.
2. We are evaluating the development of a training program specifically designed to increase the awareness and sensitivity of plant personnel in the scope of reactor and equipment safety issues.
3. Con Edison's Corporate Engineering Organization recognizes the importance of complying with procedures for verification and review of analysis and calculations, including the required documentation of these verifications and reviews. Procedures have been revised to require the assembly, submittal and check of this documentation at the time of modification issuance.
4. A station procedure has been developed, which establishes the controls needed for the identification, verification and documentation of those calculations which impact operation of the plant.
5. Engineering is developing procedural revisions to provide a formal mechanism for transmitting to the site potential safety significant issues identified by Engineering for inclusion into the SOR review process for reportability determination.
6. We will develop a program for pre-screening Field Engineering workload and requests. The backlog of Field Engineering Requests (FER) will be assigned a priority for completion. These actions will assist in (1) reducing backlogs (2) managing timely completion of FERs, and (3) meeting operating needs. Central Engineering will track this workload to facilitate management consideration of temporary or permanent increases in Field Engineering forces at the site. Responsibilities and guidelines for this program will be incorporated into Nuclear Power and Central Engineering procedures.

7. The EQ program plan document, expected to be finalized by September 30, will formalize and define the interrelationship of job functions and responsibilities to support the EQ program.

Board Recommendations for Engineering Support

1. Formalize the engineering analysis process. Provide the engineering staff with better guidance, safety perspective and training related to identifying, investigating, and resolving safety issues.

ACTIONS:

Compliance with formal requirements of the engineering analysis process is recognized by corporate and site engineering management. Nuclear Power has drafted procedural requirements for review of analyses performed by Nuclear Power and the control of analysis documentation.

A project has been initiated to identify and correct deficiencies in file records for modifications performed since plant start-up.

A consultant was retained in July 1987 to provide guidance and methods for 10CFR50.59 safety reviews/evaluation. The result of this work has been incorporated into procedures for safety impact analysis and input to safety evaluations for plant design modifications. Evaluation of procedural changes for safety review evaluation of other types of facility changes such as jumpers, temporary repairs, and plant procedures is underway. The development of a formalized program for training/retraining those personnel responsible for evaluation of plant changes in the concepts and criteria of 10CFR50.59 is underway.

2. Conduct a third party review of the engineering program and safety philosophy.

ACTION:

We will develop an overall upgrade action plan to further improve the engineering program and safety philosophy. This plan will utilize third party recommendations presented to a senior level oversight committee.