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June 1, 1989

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

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

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

Dear Mr. Russell:

This letter provides a response to the issues identified both in the Systematic Assessment of Licensee Performance (SALP) report for IP-2 dated May 3, 1989 and at the May 12, 1989 meeting between Con Edison and the NRC, at which the assessments presented in that report were discussed.

The SALP report covering the NRC's evaluation of activities at IP-2 for the period February 8, 1988 through February 28, 1989 has been reviewed. We acknowledge the report's assessments and the SALP Board's recommendations. Attachment A provides our response to each of the functional areas included in the report.

We endorse the conclusion in the report that our management initiatives over the last SALP period have resulted in improvements in all functional areas assessed. At the same time we acknowledge the importance of continued and intensified efforts toward improvement, and restate our commitment to pursue such efforts.

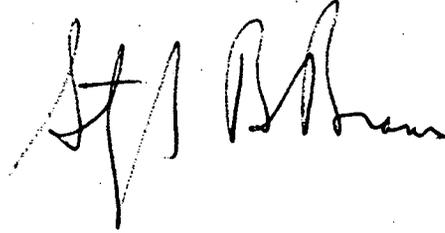
We fully intend to continue the dialogues on our improvement programs over the course of the current SALP period. Some of the meeting topics are noted in Attachment A, others will be provided later.

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If you have any questions regarding this response, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,



Attachment

cc: Document Control Desk  
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Attachment A

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
June, 1989

## OPERATIONS

We acknowledge and generally agree with the areas of strength and weakness described in the report. The improvements noted in the areas of management oversight, preplanning, training, communications, fire protection and trip reduction will be continued. In the specific area of trip reduction, we are pursuing additional improvements and have outlined a number of specific initiatives, some of which are discussed in the section on Engineering and Technical Support. These will be further discussed at a meeting with the NRC in the near future.

Management will specifically continue to emphasize and monitor procedural compliance. This will include assurance that successful operator responses to plant transient conditions are supported by effective procedures. We intend to measure the effectiveness of the procedures in place by their ability to cover off-normal conditions and accomplish their functions without undue reliance on the operator's ability to find and resolve procedural problems. We have made progress in this area by anticipating the need for, and implementing permanent procedural changes, and by providing a simpler and more integrated format for temporary procedure changes. An update of our progress in this area will also be a topic of discussion at a meeting.

We will continue to encourage questioning by operators and other plant personnel as well as their requests for assistance. We consider such actions indicative of increased attention to detail and proper safety perspective by Operations and supporting organizations. As we continue to improve both our procedures and our maintenance process, we anticipate that the need for such assistance will lessen.

## RADIOLOGICAL CONTROLS

We intend to continue the aggressive efforts in this area including the examples noted in your report with regard to recovering and maintaining areas of the plant as "non-contaminated" and reducing source terms. We fully believe that our progress to date and continuing efforts are already having a positive impact. Further attention to control of work activities and plant material condition will reinforce this effort. As noted in the SALP report, the primary measure by which the success of these efforts is determined is personnel exposure. We recognize, as do you, that primary system source term reduction is a key ingredient in substantially reducing overall exposure. We previously recognized this need and have spearheaded an industry-wide research effort on full primary system decontamination. The first phase of the program was

RADIOLOGICAL CONTROLS (continued)

completed in December, 1988, and showed the potential for substantial personnel exposure reduction. In April, 1989, Con Edison made a presentation to the ACRS Materials Subcommittee on the status of the industry program. Phase Two of the program, which will qualify the process, has already begun. The current schedule will have a topical report ready to be issued by the first quarter of 1991.

MAINTENANCE/SURVEILLANCE

We acknowledge the assessments provided in this report and the recent maintenance inspection and consider enhancement of our maintenance activities to be a top priority.

We have recently completed a review of staffing levels in the maintenance and maintenance support areas. Based on that review, we plan to provide additional permanent staffing, including mechanics, system engineers and planners. The specifics will be discussed with your staff at a meeting. We will propose to hold in the near future.

In the short term, while completing the hiring and training process, we are supplementing our existing in-plant work force with other company work forces and contractor personnel. This will allow us to begin to reduce the number of outstanding corrective maintenance work orders while establishing the long term capability to address corrective maintenance requirements in a timely manner. A measure of effectiveness will be our success in this effort. In addition, we fully expect that the predictive maintenance and improved PM programs which we have previously discussed will gradually result in fewer significant corrective maintenance work actions, and therefore contribute to maintaining a reduced backlog. The decrease in backlog will be seen over the course of the current SALP period and beyond. An additional measure of the effectiveness of our improvements will be a reduction in the need for procedural changes that compensate for equipment or functions which are unavailable due to maintenance.

Work prioritization is already being done using PRA-based methodology as a tool. As a result, we believe our current prioritization of work is appropriate. However, a reduced backlog will result in fewer prioritization issues. Pursuant to discussion at our May 12, 1989 meeting, we are evaluating current industry programs for integrating Probabilistic Risk Assessment (PRA) into the maintenance process, and where feasible, we will seek to enhance the current use of PRA at our facility by implementing similar approaches.

MAINTENANCE/SURVEILLANCE (continued)

In the Surveillance area, the need for training and gradual re-assignment of Test and Performance functions to the System Engineers was recognized from the inception of the program. The need to provide additional resources to the Test group during the transition period is also being evaluated. The computer-based scheduling system which we initiated has continued to perform effectively. Equipment return to service testing has been expanded and improved. Review of completed tests has been strengthened by the additional review by the Shift Technical Advisors.

EMERGENCY PREPAREDNESS

On February 9, 1989, we received the NRC's letter requesting that we re-evaluate our Emergency Action Levels (EAL's), which after more than a year of developmental work (including discussions with the NRC staff) had been submitted during the last quarter of the SALP period. The NRC staff's position was clarified during a May 12, 1989 conference call and we have already completed those actions which we understand to be acceptable to the NRC. Given this timing, we would ask the SALP Board to reconsider its statement on page 16 in the SALP report, "However, actions still have not been taken to address concerns raised regarding the revised EAL classification schemes", which might be misinterpreted to indicate a long-standing deficiency. We have implemented the change to our Emergency Action Levels (EAL's), as we recently discussed with the staff. Training and discussions with offsite authorities on the revised EAL's have also been completed. We may wish to revisit the question of the application of the guidance in NUREG-0654 with respect to barrier-based classifications.

SECURITY

Management will continue to carry out the enhancements and improvements discussed in the report. Program effectiveness will be evaluated periodically to assure that factors such as personnel turnover will not degrade or adversely affect the existing high levels of performance.

ENGINEERING/TECHNICAL SUPPORT

We acknowledge your assessment in this area and are placing increased emphasis on the formalization of the overall engineering support function and the completeness of documentation of the underlying bases for evaluations and judgements. Our presentation to you on February 27, 1989 outlined the activities being undertaken to achieve improvement in the areas of Engineering and Technical Support. The Central Engineering procedures governing the Indian Point modification processes have undergone an upgrading, and revised procedures are now in effect. The improvements are intended to provide enhanced clarity and more fully address the completeness and consistency of documentation, interfaces with Nuclear Power, and additional completeness reviews for modification packages. The revised procedures incorporate the accepted improvements recommended by Third Party reviews and the Vice President - Engineering special review team.

Central Engineering is establishing a project organization at the department level dedicated to engineering support of Indian Point projects. The new project organization will include a newly assigned staff of scheduling and planning personnel to participate in formulating long range engineering support plans and requirements.

Since February 1, 1989, a special team reporting to the Vice President-Engineering, has been reviewing engineering projects for the purpose of assuring safety and quality of the design. Feedback from the reviews is taken into consideration for procedure and training upgrading. In the near future, the new project organization will be charged with responsibility for technical quality and complete documentation of the project file, and the special team will be shifting focus to engineering assurance aspects such as effectiveness of process control, training needs, technical issue resolution, and performance-based evaluation of engineering programs.

Although most nuclear projects are initiated by Nuclear Power through a formal request process, it is not intended that communication between Central Engineering and Nuclear Power be inhibited by this process, and in fact we believe communication and involvement between the two organizations has been heightened. Central Engineering is both called upon and initiates input based on its experience and participation in industry initiatives.

Within Technical Services, the increased formalization and expansion of the 10 CFR 50.59 process is continuing as outlined at our November 8, 1988 meeting with the NRC staff, and full implementation of the System Engineer program is progressing. A Station Administrative Order (SAO) and an associated Central Engineering procedure addressing the 10 CFR 50.59 process has been implemented. As stated under the Maintenance section, a staffing review has recently been completed in Technical Services. Based on that review, we plan to provide additional staffing in the areas of System Engineers and Equipment Analysis. The trip reduction effort discussed above in the "Operations" section is being pursued as a joint

ENGINEERING/TECHNICAL SUPPORT (continued)

Engineering and Technical Services effort and will be examining such options as:

- o Optimization of test frequencies and setpoints
- o Channel trip requirements
- o Changes to operator response procedures
- o Additional operator information
- o Control system improvements

In addition, an independent review group of senior technical personnel has been established to provide review and oversight from a safety perspective, of ongoing technical issues within the plant. This review group functions separately from the line organizations and makes recommendations to the Vice President- Nuclear Power.

Recent initiatives taken near the end of the SALP period adjusted the responsibility and duties of System Engineers to further define their role in support of maintenance activities. A Job Task Analysis which was initiated as part of the development of System Engineer training has contributed to the enhanced definition of their responsibilities and authorities.

We intend to propose a meeting to update you on our ongoing activities for continued improvement in the area of Engineering and Technical Support as outlined above.

SAFETY ASSESSMENT/QUALITY VERIFICATION

By its nature, and as affirmed in your report, this function spans and is intimately linked to all the other functional areas. We believe that our commitment and actions toward improvement in the other functional areas will be both a cause and effect of improvement in this area.

The programs and processes that are now being put into place with regard to engineering and technical support will allow us to better address both the short and long term resolution of identified concerns. The growth of the System Engineer program and the expansion of the maintenance support functions will allow us to closely monitor concerns through to resolution and highlight and address impediments to timely corrective action. The program we now have in place to prioritize engineering activities, reflecting probabilistic risk assessment (PRA) considerations and tracked in a central computerized system, highlights safety-sensitive work and focuses engineering resources in the proper areas.

Our improved 10 CFR 50.59 process will both serve to focus and enhance the thoroughness of Station Nuclear Safety Committee review.

SAFETY ASSESSMENT/QUALITY VERIFICATION (continued)

A Station Administrative Order which discusses the importance of addressing concerns raised by individuals regarding nuclear safety and delineates the process of communicating those concerns to Management and responding to those concerns has been revised and strengthened. The revised document has been distributed to plant personnel.

With respect to quality verification, we are addressing a number of options by which to establish stronger independent assessment of the scope, technical adequacy and timeliness of corrective actions emanating from our problem identification systems and increase the sensitivity and ability of the line organization to recognize and implement effective corrective action.

In addition, we are reinforcing the authority of the Director of Nuclear Quality Assurance (NQA) to independently report on the need for corrective action and its effectiveness to the appropriate level of management. To this end, as an example, the NQA Director will now routinely attend the meetings of the Nuclear Facilities Safety Committee.