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October 16, 1992

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

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

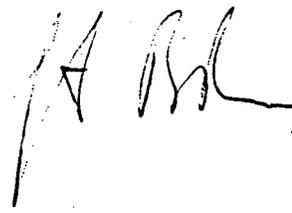
SUBJECT: Reply to Inspection Report 50-247/92-19, Notice of  
Violation

This is in reply to your letter dated September 15, 1992, concerning the safety inspection conducted by Messrs. G. Hunegs and D. Stampfli from July 26, 1992 to August 29, 1992. As discussed with the Resident Inspector on October 9, this response is being submitted at this time due to the delays in receiving the letter which contained the Notice of Violation.

The attachment to this letter constitutes our response to the Notice of Violation included with your letter as Appendix A.

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  
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ATTACHMENT

REPLY TO NOTICE OF VIOLATION  
50-247/92-19

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
OCTOBER, 1992

NOTICE OF VIOLATION

During an NRC inspection conducted from July 26, 1992 to August 29, 1992 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 (1991), the violation is listed below:

Technical Specification 6.8.1 requires, in part, that written procedures shall be implemented covering the requirements of ANSI N18.7-1972, Section 5.3. This section states that nuclear power plants shall be operated in accordance with written procedures. Station Administrative Order (SAO) 217, in part, requires the following:

- a) Operational equipment which supports the operation of installed station equipment shall be calibrated.
- b) An equipment usage review and a Significant Occurrence Report shall be generated to document and evaluate non-conforming operational equipment.

Contrary to the above, from May, 1990 until July, 1992,

- a) The 113 gauges which support the operation of the weld channel and penetration pressurization system were not calibrated.
- b) An equipment usage review and a Significant Occurrence Report were not generated to document and evaluate the above non-conforming operational equipment.

This is Severity Level IV Violation (Supplement I).

REPLY

This violation consists of a field deficiency and inadequate documentation of the effects on system operability. The field deficiency is that 113 Weld Channel Penetration Pressurization System (WCPPS) gauges were not calibrated on the established frequency of the Performance Preventative Maintenance Program, PMP-1. The reason for the violation was that the gauges were welded in-place and could not be calibrated without certain in-place calibration equipment which was not available onsite at the time calibration was to be performed. A contributing reason for the violation was that the administrative directives and implementing procedures which describe the practices used by the Test and Performance section to implement SAO 217 were misinterpreted as to whether the generation of an equipment usage review and a Significant Occurrence Report was or was not required. As a result, the appropriate organizations were not formally notified of the field deficiency.

The gauge calibration issue was originally self identified by the licensee's Performance Group in 1990. Due to the design of the gauges, particularly the use of welded-in-place tubing, the gauges could not be calibrated with existing test equipment. Despite the absence of an SOR, a request for a design change and the purchase of the necessary equipment to perform in-place calibration of the WCPPS gauges was made by Test and Performance in May, 1991. As a result, the calibration equipment was received on May, 1992 and all 113 of the gauges in issue were calibrated by September 2, 1992, which occurred prior to the issuance of the inspection report. Thus all referenced gauges were in fact calibrated prior to the issuance of the inspection report in response to a self-initiated program. All gauges, except for one were found within calibration limits. Operations has installed a test gauge as a temporary modification to compensate for the one gauge that was found to be outside of calibration limits. An SOR was written to report the inoperability of this gauge as required by SAO-217. Full compliance has thus been achieved.

During the period in which the calibration of these gauges had expired other methods were in place to assure WCPPS operability. The four zone pressure instrumentation and annunciation channels were operable during this period and correctly calibrated. The system valve line-up was controlled by appropriate administrative controls such that had a portion of the zone been depressurized it would have been responded to by the CCR without the need for the gauges. Therefore, the failure to timely calibrate these gauges in accordance with PMP-1 did not affect the operability of the WCPPS.

In order to avoid reoccurrence of this violation, Test and Performance is revising their Administrative Directive and Implementing Procedure for gauge calibration. These documents will more clearly define the requirements of writing SORs and performing equipment usage reviews of nonconforming operating gauges. These documents will be revised prior to the end of the 1993 Refueling Outage.