Stephen E. Quinn
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340

November 18,1996
Re: Indian Point Unit No.2
Docket No.50-247

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

SUBJECT: Reply to Inspection Report 50-247/96-04; Notice of Violations

The attachment to this letter constitutes Con Edison's reply to the Notice of Violations (NOV) included with your October 15,1996 letter based upon the inspection conducted from June 23,1996 through August 3, 1996 at the Indian Point 2 facility and the Predecisional Enforcement conference held on September 12, 1996.

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

Very truly yours,

Stephen E. Quinn

Subscribed and sworn to
before me this 18th day
of November, 1996.

Manuel Sanchez Jr.
MANUEL SANCHEZ, JR.
Notary Public, State of New York
No. [illegible]
Qualified in Dutchess County
Commission Expires March 30, 1997
Notary Public

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cc: Mr. Hubert J. Miller
Regional Administrator - Region I
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ATTACHMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO.50-247
NOVEMBER, 1996

RESPONSE TO NOTICE OF VIOLATION

VIOLATION A

Technical Specification (TS) Section 6.8.1 requires that written procedures be implemented covering activities referenced in Regulatory Guide 1.33, dated November 1972. Regulatory Guide 1.33 requires the implementation of written procedures that govern procedural adherence. Station Administrative Order (SAO)-133, " Procedure , Technical Specification and License Adherence and Use Policy," implements this requirement. Section 5.1.1 of SAO-133 states that procedures shall be followed.

Contrary to the above , for an indeterminate but extended time period up until July 11,1996, the requirements of SAO-133 were not followed in that licensed operators did not follow the provisions of System Operating Procedure 10.1.1, "Safety Injection Accumulators and Refueling Water Storage Tank Operation."Specifically, each and every time that the operators adjusted accumulator nitrogen pressure per Section 4.1.5 of SOP 10.1.1, they failed to close PCV-863, as required by step 4.1.5.6, upon completion of accumulator pressure adjustment.

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

Reply to Notice of Violation

Con Edison concurs that SOP 10.1.1 was not fully complied with, as stated in the notice of violation. The SOP requires valve PCV-863 to be closed after the SI Accumulators have been pressurized with nitrogen, as needed. A contributing factor to this event was determined to be administrative controls, which did not require, in this instance, procedures to be in hand for a routine evolution. When it was determined that PCV- 863 was not in the procedurally required position it was closed. Operators coming on shift were immediately instructed to maintain this valve closed in accordance with the SOP.

In an effort to preclude future instances of this nature, management's expectations and standards for procedural compliance and use were reinforced during meetings between the Operations Manager and all Operations Section personnel. A Task Review Sheet has since been created to evaluate operational activities performed on shift versus procedural guidance. Additionally, a new procedure SOP 10.6.4, " Operation and Control of Non-Automatic Isolation Valves," was developed. The intent of this procedure is to provide an additional level of administrative control for operation of certain non-automatic Containment Isolation Valves (CIV's). Further, operations procedure adherence policy has been revised to identify specific procedures and tasks to be performed with procedure in hand. A requirement for annual audits of these activities will

ensure that compliance is maintained.

A comprehensive corrective action effort was immediately initiated to review all containment isolation valves. These detailed reviews were conducted to verify consistency among the various documents (ie: FSAR, Technical Specification , SOP's ,drawings), and Open Item Reports (OIR's) were initiated to address any discrepancies. OIR corrective actions included the completion of operability determinations and safety evaluations.These determinations and safety evaluations are complete. All necessary plant operating procedures were reviewed and revised as appropriate.

VIOLATION B

10 CFR Part 50 Appendix B, Criterion XVI, " Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, and deviations, are promptly identified and corrected.

Contrary to the above, a condition adverse to quality was not promptly corrected for an indeterminate but longstanding time period leading up to July 11, 1996. Specifically, Con Edison failed to take prompt and adequate corrective action for chronic leakage associated with the nitrogen supply line inside containment, causing licensed operators to leave open valve PCV-863 to compensate for this condition.

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

Reply to Notice of Violation

As noted in the Violation A above, valve PCV-863 was operated in the open position which tended to mask nitrogen leakage. When valve PCV-863 was closed , the increased nitrogen leakage became readily apparent and immediate corrective action was taken. The cause for increased nitrogen leakage /usage was investigated. It was identified as fitting /packing leaks, and a regulator, which needed adjustment. These items were corrected during several containment entries.

During the spring 1997 refueling outage, system walkdowns will be performed to identify any leaks inside containment. Rectification at that time is intended to ensure similar situations will not occur.