

Stephen B. B...
Senior Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-1200

February 23, 1998

Re: Indian Point Unit No. 2

Docket No. 50-247

Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Subject: Requested Meeting on Indian Point 2 Performance

Dear Mr. Miller:

Your letter of January 23, 1998 requested a meeting with Consolidated Edison Company of New York in the near future to review and discuss equipment and human performance issues at Indian Point Unit 2. In order to assure that the activities that we are planning to discuss have a good measure of station personnel buy-in and support, an extensive validation activity is currently underway with station personnel. Focus areas have been identified, including organizational management, corrective action, work control, engineering, and operational activities (including issues relating to procedural adherence and identification of anomalous conditions). The task activities being developed in these focus areas are also being validated against the results of our self-assessments.

As a further validation that we have been able to identify the significant areas that would benefit from performance enhancement and develop proper corrective action plans for these areas to improve and sustain performance excellence, Con Edison will conduct an Independent Safety Assessment of facility operations and support using an outside team of independent senior industry personnel. The charter being developed for this activity will be based upon NRC's Inspection modules for conduct of Operational Safety Team Inspection (OSTI - 93802) and Effectiveness of Licensee Controls in Identifying, Resolving, and Preventing Problems (40500). I have asked Charles W. Jackson, Manager Nuclear Safety and Licensing, to take the lead in preparing for the Independent Safety Assessment, and he plans to discuss with your staff this week the charter, schedule, and personnel proposed for this Assessment.

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Mr. Hubert J. Miller

Considerable physical work has already been accomplished during the current maintenance outage. Over 2600 work orders have been completed. Noteworthy among these have been the refurbishment of the DB-50 and DB-75 circuit breakers, and control room upgrades, including correction of wiring issues relating to annunciator alarms, and reduction of jumpers and operator workarounds. An extensive verification activity is being conducted for low voltage instrument busses to assure plant configuration, procedure, and drawing consistency. We have also directed a considerable work effort inside containment to walkdowns of systems to identify and enhance the condition of coatings and insulation. In addition, our efforts have been directed at reviewing our procedures for operation and surveillance testing. This included a verification effort with our plant simulator for startup procedures.

Based upon our current projection of work remaining and our schedule to meet with facility staff on performance enhancement plans, a meeting with you and your staff on March 19, 1998 is proposed. This will be in advance of our planned return to service. As always, we will keep your staff informed of any changes in our schedules in a timely manner.

Very truly yours,



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