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Senior Vice President

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July 1, 1998

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

Mr. Hubert J. Miller  
Regional Administrator - Region 1  
US Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Subject: Indian Point Restart

Dear Mr. Miller:

Since our public meeting to discuss Con Edison's response to the Independent Safety Assessment (ISA) on June 4, 1998, we have continued to make progress in preparing Indian Point Unit 2 for restart. I want to repeat what we stated at the ISA meeting: Con Edison fully accepts the ISA findings and has moved to incorporate actions addressing the findings into our plans. Many ISA initiatives are in progress and are providing insights and progress towards understanding and addressing cultural weaknesses identified by the ISA. For example, to address the isolationism identified by the Management Section of the ISA, station management has initiated a top down benchmarking program. The Plant Manager from the Salem Plant has visited our Plant Manager to share pertinent experiences related to restart/recovery of the Salem Plant. In addition, the Operations Manager has completed visits to both the Salem Plant to gain insight on the lessons learned from their restart/recovery programs and to the Catawba plant to benchmark configuration control. The Work Control manager attended an INPO Workshop to benchmark the work control processes. In addition, an INPO assist visit resulted in a program, currently in progress, to establish the benchmarking of plants with best practice work control.

This top down approach should be effective in breaking down cultural barriers to change, thus removing identified weaknesses in human performance processes such as procedure adherence, informality in corrective actions and work management. Examples of action being taken in other areas include; 1) implementation of station procedures to maintain Technical Specifications cross-referenced to Test Procedures; 2) additional guidance for both system health reviews and operability determinations has been promulgated; 3) installation of an upgraded database management system (Condition Reporting System); and 4) improvement of the self assessment process after benchmarking for the QA Organization. In addition, the QA organization has conducted

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a peer QA assessment with peers from other utilities such as Northeast Utilities, PECO Energy, and The New York Power Authority. Additional Con Edison responses to ISA findings may be reviewed in Attachment B, Response to ISA Findings.

To supplement the operations staff, the Operations Mentor program is proving valuable in providing coaching on standards and expectations for each of the Operating crews, measurable improvements in watch communications and procedure adherence have been achieved. Four Senior Managers on Watch (SMOW) are now on shift with the watch crews and are providing excellent support to the Plant Manager in improving work management. The SMOWs have been chartered to provide three important services in support of operations with primary focus on the control of work: 1) ensure that our focus is fully and rigorously addressing any equipment or human performance issues during restart and return to service; 2) ensure proper Company resources are identified and applied promptly to any emergent problems that may occur during restart and return to service; and 3) provide direct senior management observation and evaluation to increase the opportunities for improvement in processes and personnel performance in configuration control. These senior managers have extensive plant experience and three of them hold SRO certifications. The fourth senior manager has extensive US Navy experience coupled with plant experience as a senior manager in the QA organization. They provide direct feedback to the Plant Manager on their observations and recommendations for improvements on a daily basis. An additional longer range benefit of this initiative is that these managers are developing a first hand appreciation of the broad range of challenges and issues routinely faced by the operations organization. This insight will enhance their support of operations when they return to their normal assignments.

The Executive Oversight Team is now in place. The team consists of five seasoned senior nuclear executives with significant experience at other nuclear plants with strong operations-centered safety culture. This team reports to the Chief Nuclear Officer, and two of the members have accepted permanent Vice President positions with Con Edison. Their role is to mentor and coach the line managers on the important issues affecting plant operations so that the focus of the entire station is on making sure the control room operators have the support they need. The Executive Oversight Team also has the unique ability to provide continuous, objective observations of the effectiveness of the initiatives to improve plant processes and personnel performance. Their observations will be an element in the Chief Nuclear Officer's determination of readiness to restart.

These initiatives, coupled with an influx of management talent at all levels of the nuclear organization during the past year, have provided a significant improvement in our ability to recognize and act on the questions and issues important to operations. Changes of personnel in the key roles of Chief Nuclear Officer, Vice President of Nuclear Power, Plant Manager, Operations Manager, Director of Quality Assurance, Maintenance Manager, Instrumentation and Controls Manager, Chief Engineer - Nuclear Power Engineering, Work Control Manager, Station Nuclear Safety Committee

Chairman, the creation of Vice President Generation Engineering position and the new Assistant Operations Manager position responsible for corrective action and human performance will provide a new fresh team to assist in assuring the restart is a safe return to operation.

To ensure a safe restart subsequent to a realignment of crew assignments, the operations department has initiated additional operator training to improve several observed instances of weak performance identified in the ISA findings. The key objectives of this training are to improve implementation of standards of performance and to develop both teamwork and conservative decision making among the newly organized crews. Additionally, this training will include practicing self-checking and cross-checking along with the use of two and three point communications to promote effective communications and team work. Though the crew assignment changes have not been extensive, there is a need to ensure that each crew develops a sense of unity and cooperation before proceeding to critical operations. Each watch crew will complete the enhanced training program including simulator startup and shutdown operations and the exercise of abnormal operating procedures. As detailed in Attachment A, Restart Readiness Training will also be provided for each crew prior to taking the watch during reactor startup or while the reactor is critical.

During the current outage a number of significant plant material accomplishments have been made. Included in these accomplishments are: completion of over 5,500 work orders including 342 Central Control Room deficiencies, 46 work orders, related to Operator Work-Arounds and 294 plant modifications. The extensive actions undertaken to improve the plant material condition and equipment performance are nearing completion. The backlog in Central Control Room deficiencies and operator work-arounds has been reduced. The large majority of physical work identified in our Restart Action Plan (RAP), which is enclosed as Attachment B, will be completed by mid July, and the emphasis will shift to post maintenance testing, surveillance testing and system line-ups prior to moving the plant above 200°F.

It is clearly recognized that new work orders for Structures, Systems and Components important to safety must get the same level of evaluation as those previously evaluated for restart. To this end, the Plant Manager is tasked with reviewing these work orders to determine if plant restart may proceed with these new items remaining open.

The RAP provides the formal mechanism for certifying that all of the restart commitments identified in our letter of March 23, 1998 and your Confirmatory Action Letter (CAL No. 1-98-005) to us of March 26, 1998, have been successfully completed. The RAP also contains the additional items from our restart criteria addendum of May 18, 1998, and those items that were added as a result of the ISA findings and from our presentation to you on the ISA findings on June 4, 1998. The plan includes a schedule date for completion of each item. An item will not be considered "complete" until it has been accepted by the Restart Readiness Review panel as described in the plan. We will keep the Resident Inspector fully informed regarding our progress in completing these

actions, and also of our schedule for "close out" presentations to the Restart Readiness Review panel so that NRC inspection efforts can be synchronized with our restart actions.

In our June 4, 1998 presentation (the public meeting handout is provided as Attachment C), Con Edison also indicated that we would provide NRC at least 30 days notice of our anticipated restart date. We reaffirm that commitment and agree that with respect to this 30 day notification, "restart" will mean "reactor criticality." In that regard, we currently are planning for a mid July outage closeout, with plant restart on or about July 31, 1998.

We also welcome the opportunity to meet with you and your staff again as we approach completion of the RAP requirements for reactor startup to discuss our assessment of the effectiveness of actions taken and any plan adjustments that are made between now and that time. We anticipate meeting with you for that purpose approximately a week to ten days prior to taking the reactor critical.

Sincerely,



Neil S. Carns

Attachments:     A     Restart Readiness Training  
                  B     Restart Action Plan  
                  C     Response to ISA Findings

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