

DES

JAN 29 1993

Docket No. 50-247

EA No. 92-245

Mr. Stephen Bram
Vice President, Nuclear Power
Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway and Bleakley Avenues
Buchanan, New York 10511

Dear Mr. Bram:

SUBJECT: NOTICE OF VIOLATION - INSPECTION REPORT NO. 50-247/92-22

This refers to the resident safety inspection conducted by G. Hunegs and D. Stampfli from September 27, 1992 to November 7, 1992, at the Indian Point 2 Nuclear Generating Station. During this inspection, several longstanding issues associated with the technical support center (TSC) ventilation system were noted. The longstanding nature of these deficiencies and the associated testing and work practices indicated that management attention and efforts were not commensurate with the importance of the TSC for event response. The issues related to the TSC ventilation were discussed at an enforcement conference at the NRC Region I Office on January 15, 1993.

We have concluded that the TSC ventilation system was inadequately maintained and was in violation of NRC requirements as specified in the enclosed Notice of Violation (Appendix A). You indicated during the enforcement conference that you considered the TSC to be functional. However, until October 1992, the maintenance, testing and corrective actions that had been performed were not adequate to correct the problems associated with the TSC. Also, the current design of the TSC ventilation system is different from the design referenced in your design document. This is considered a deviation as outlined in the enclosed Notice of Deviation (Appendix B).

Among the issues discussed, we are particularly concerned that a stop tag on the carbon filter unit fan was improperly cleared, thus rendering the operability of the system questionable for a protracted period of time. In addition, it does not appear that the TSC habitability was properly considered with respect to air conditioning in the incident response mode and TSC ventilation charcoal was not properly maintained and tested.

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It is apparent that these issues were not appropriately addressed in your actions in response to NRC Information Notice (IN) 92-32, "Problems Identified with Emergency Ventilation System for Near-Site (within 10 miles) Emergency Operations Facilities and Technical Support Centers". Your response should include your assessment of the above concerns, as well as a discussion regarding your assurance that other emergency response facilities are properly maintained.

This violation has been categorized by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter, and in preparing your response, you should follow the instructions in Appendix A. In addition, you are requested to respond to the Deviation as outlined in Appendix B.

Your cooperation with us is appreciated.

Sincerely,

Charles W. Hehl, Director
Division of Reactor Projects

Enclosures:

- (1) Appendix A, Notice of Violation
- (2) Appendix B, Notice of Deviation
- (3) Enclosure 3, Enforcement Conference Attendance

cc w/encls:

C. Jackson, Manager, Nuclear Safety and Licensing
B. Brandenburg, Assistant General Counsel
P. Kokolakis, Director, Nuclear Licensing (NYPA)
C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law
Director, Energy & Water Division, Department of Public Service, State of New York
W. Stein, Secretary - NFSC
K. Abraham, PAO
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York, SLO Designee

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bcc w/encl:

Region I Docket Room (with concurrences)

C. Cowgill, DRP

J. Yerokun, DRP

L. Nicholson, DRP

S. Greenlee, DRP

G. Hunegs, SRI - IP-2

V. McCree, OEDO

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