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Vice President

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October 28, 1993

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

Mr. Jacque P. Durr
Chief, Engineering Branch
Division of Reactor Safety - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

SUBJECT: NRC Region I Inspection Report No. 50-247/93-06

The subject report presents the findings of an inspection that was conducted by D. Moy, M. Buckley and B. Whitacre and which focused on refueling and startup testing activities. We have recently completed our review of the subject document and would like to provide the following comments.

The cover letter for the inspection report indicated that no violations were identified and that, "in general, refueling and startup activities were performed in accordance with detailed procedures and in a controlled manner by knowledgeable personnel." We believe this to be true and appreciate the statement. However, the conclusion section of the report appears to contradict this positive remark by indicating that several temporary procedure changes were not implemented according to procedure.

During the course of the inspection, we attempted to communicate to the inspectors that the temporary procedure changes were, in fact, accomplished properly as required by our procedures (SAO-100 as opposed to MAD-4). We believe that the changes represent a positive example of adherence to our change control process requirements in SAO-100. We take exception to the statement in the conclusion section of the subject report. It is our plan to review this matter with the Resident Inspectors.

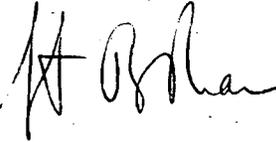
The conclusion section of the report refers to a test control concern. Con Edison does not agree that a test control concern existed. This position is explained in the attached comments.

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

Very truly yours,



cc: Document Control Desk
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Mr. Thomas T. Martin
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Last Para.

1st Sent. The report states: "The inspector observed the dynamic testing of MOV 1810 on February 23, 1993." The inspector actually witnessed the dynamic testing of MOV 1810 on March 23, 1993.

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Last Para.

2nd Sent. The report implies that the valve was overthrust on February 23, 1993, and that the thrust was taken by the hold down bolts. The valve was "overthrust" during the static test performed on February 17. This overthrusting occurred when the stem was run into the load cell in the opening direction. In this configuration the thrust is taken by the stem. The statement contained in the report regarding the limit of the hold down bolts is correct, however the bolts are not in the thrust action in this configuration.

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Last Para.

Last Sent. The report states: "The valve was subsequently evaluated to be undamaged and declared operable on April 4, 1993." This evaluation was actually completed on March 31, 1993.

Page 8,

4th Para.

Last Sent. The report indicates that the NRC had a "test and control concern". In view of the above comments

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5th Para. program Con Edison does not agree that the event

Last Sent. of February 17 should be characterized as involving a test control concern.