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January 7, 1994

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

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

SUBJECT: Reply to Notice of Violation, NRC Inspection
Report No. 50-247/93-25

REFERENCE: NRC Letter dated December 9, 1993, Inspection
Report No. 50-247/93-25, C. J. Cowgill to S. Bram

This letter responds to the referenced December 9, 1993
Notice of Violation (NOV) pertaining to procedural adherence
during the performance of a gas turbine blackstart timing
test. Our reply to the NOV is contained in Attachment A.

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

Very truly yours,

Thomas J. Williams

cc: Mr. Thomas T. Martin
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ATTACHMENT A

REPLY TO NOTICE OF VIOLATION
INSPECTION REPORT 50-247/93-25

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JANUARY, 1994

REPLY TO NOTICE OF VIOLATION

VIOLATION:

During an NRC inspection conducted from October 10, 1993, through November 13, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the following violation was identified:

Technical Specification (TS) 6.8.1 states that written procedures shall be established, implemented and maintained per section 5.1 and 5.3 of ANSI N18.7-1972. TS 6.8.2 states that each procedure and administrative policy of TS 6.8.1, and any changes to them, shall be reviewed and approved for implementation in accordance with written administrative control procedures. TS 6.8.3 states that a mechanism shall exist for making temporary changes.

Station Administrative Order (SAO)-133, "Procedure, Technical Specification and License Adherence and Use Policy," section 5.1.1 states that in the event plant operation cannot be performed in accordance with approved procedures, and an emergency condition does not exist, a procedure change shall be made as specified in SAO-100, "Indian Point Station Procedure Policy," and in appropriate administrative directives.

Operations Administrative Directive 15, "Policy for Conduct of Operations," section 6.1.9 states that, in situations where plant operation cannot be performed in accordance with approved procedures, the procedure shall be suspended and action shall be taken to place the plant in safe condition. A procedure change shall then be initiated prior to continuing with the procedure actions.

Contrary to the above, on November 2, 1993, during the performance of test PT-V42, "Gas Turbine Blackstart Timing," on gas turbine No. 3, operators conducting the test did not suspend the test and make a temporary procedure change when an unanticipated system response by the blackstart diesel generator and subsequently by its associated electrical output breaker. Instead, the operators continued to test and took additional actions not stated in the test procedures PT-V42 and SOP 31.3.2, "Gas Turbine 3 Local Operations."

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

REPLY:

Pursuant to the Station Blackout Safety Evaluation Report dated November 21, 1991, the November 2, 1993 test of Gas Turbine No. 3 was conducted to demonstrate the ability of the Gas Turbine to be blackstarted. Gas Turbine No. 3 is designed to be able to blackstart using a diesel generator to supply its auxiliary loads and to be able to supply the 480V buses within one hour. While performing this test, this blackstart diesel generator did not automatically start as described in Station Operating Procedure (SOP) 31.3.2 when the auxiliary normal supply breaker was opened per the test procedure. The operators believed this to be an equipment failure at the time, although it was later determined to be a procedural problem. The blackstart diesel generator was then manually started. However, the emergency supply breaker to the gas turbine auxiliary bus (blackstart diesel

generator output breaker) did not close automatically when the blackstart diesel was at normal speed and voltage output as described in SOP 31.3.2. The loss of voltage relays sense the voltage of the gas turbine 13.8 kV electrical bus upstream of the auxiliary normal supply breaker. Since the normal supply power to the gas turbine 13.8 kV electrical bus was not deenergized as part of the test (this would have required an outage on 13.8kV feeder 13W94), which would occur in an actual station blackout, the loss of voltage relays did not sense a normal power supply loss and did not provide for the automatic start of the blackstart diesel and closure of its output breaker. The operator did not suspend the test and initiate a temporary procedure change prior to proceeding with the test after the blackstart diesel generator did not start automatically. Even with the manual actions taken, a successful time was achieved for the test.

The test procedure incorporated the SOP on Gas Turbine No. 3 local operation. The reason for the violation was operator misinterpretation of a statement in the precautions and limitation section of the test procedure. The statement indicated that if any action required by the SOP did not occur, it shall be noted in the comment section of the test procedure. This was interpreted by the operator performing the test to mean that he should note the fact that the blackstart diesel generator did not start and then manually start it.

The following corrective actions have been taken in response to the specific event:

- a. a Temporary Procedure Change (TPC) was written and approved for SOP 31.3.2 providing for manually starting the blackstart diesel generator and closing its output breaker when 13.8kV feeder 13W94 remains energized for a blackstart test.
- b. a TPC was written and approved for the Test Procedure PT-V42 clarifying the statement in the precautions and limitations section.

The following corrective actions have been taken to avoid further violations:

- a. the Operations Manager has reinforced to the watch crews the importance of writing TPC's when a procedure cannot be followed as written.
- b. the Test and Performance Manager has revised the administrative procedure, TS-SQ-11.015, "Surveillance Test Procedure Issuance and Review Process" to add clarifications to the Test Instruction Sheet (Addendum 8.1 of the procedure) on when a TPC must be written.

With the implementation of these corrective actions, full compliance has now been achieved.