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March 9, 1994

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

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

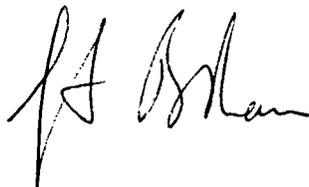
SUBJECT: Reply to Notice of Violation NRC Inspection
Report No. 50-247/93-27

REFERENCE: NRC Letter dated January 25, 1994,
"NRC Region I Resident Inspection Report No.
50-247/93-27", C. J. Cowgill to S. Bram

This letter responds to the Notice of Violation (NOV) pertaining to the adequacy of the containment entry and egress procedure and the implementation of the operational gauge calibration program contained in the referenced letter. Our reply to the NOV is contained in Attachment A. As discussed with the Resident Inspector on February 18, this response is being submitted at this time due to delays in receiving the letter which contained the Notice of Violation.

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

Very truly yours,



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Subscribed and sworn to
before me this 9th day
of March, 1994.

Karen L. Lancaster

Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643883
Qualified in Westchester County
Term Expires 9/30/95

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JEC

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ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

NRC INSPECTION REPORT No. 50-247/93-27

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MARCH 9, 1993

REPLY TO NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted from November 14, 1993 through December 25, 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 specifications (TS) 6.8.1 requires that written procedures shall be established and implemented covering the activities referenced in ANSI N18.7-1972 and Regulatory Guide 1.33, Appendix A, November 1972. Station Administrative Order (SAO) 219 establishes instructions for containment entry and egress. SAO 217 requires the implementation of a calibration and control system for operational pressure gauges.

Contrary to the above,

- A. Adequate instructions for containment airlock pressure equalization were not established in SAO 219 and contributed to the failure of the 80' airlock inner door on September 10, 1993. Specifically, there was no guidance on the proper use of the inner and outer door equalizing valves to relieve pressure differentials inside the airlock. In addition, there was no reference to the pressure gauges installed at each airlock which are intended to provide containment and airlock pressure indication. This contributed to damage to a containment penetration and containment integrity requirements of TS 3.6.A.1.d were not met for approximately 1 minute.
- B. An adequate operational gauge calibration program was not implemented as required by SAO 217. The specific inventory and frequency of gauge calibrations were not in accordance with the program. This also contributed to the airlock inner door failure in that properly installed and calibrated airlock pressure gauges would not have been available to the operators to determine airlock pressure, even if referenced by SAO 219.

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

PART A RESPONSE

On September 10, 1993, the 80' containment inner door was damaged during a routine monthly containment entry. The door gasket seals on the airlock doors are pressurized with air from the Weld Channel and Penetration Pressurization System (WC&PPS) which provides air at approximately 47 psig. There are a pair of in-series pressure relieving check valves for the airlock to prevent inadvertent overpressurization of the airlock due to long term leakage from the WC&PPS. Additionally, Station Administrative Order 219 (SAO-219), the containment entry and egress procedure, allows the inner or outer airlock door to remain with the handwheel one to one and one-half turns open. This is intended to leave one door to the airlock with its

equalization ball valve open to equalize pressure in the airlock. It has been standard practice to leave the inner air lock door with its handwheel open one to one and one-half turns in case the check valves fail to function properly.

It appears that a leak in the outer airlock door gasket seal developed which allowed (WC&PPS) air to enter the airlock. It also appears that, prior to this containment entry, the inner door handle was not left in a position that allowed airlock pressure equalization with containment and the series pressure relieving check valves failed to function. This allowed the airlock to become pressurized.

SAO-219, revision 9, which was in effect at the time of this containment entry, did not contain adequate guidance for airlock pressure equalization. The procedure required the operator to verify that both inner and outer doors were closed and then open the inner door. In the process of insuring that the inner door was closed, the inner door was "blown" open due to the overpressure condition of the airlock.

Immediately upon identification of the damage to the 80' airlock door, a Temporary Procedure Change (TPC) was made to SAO-219 which required closing both the 80' air lock doors and locking the outer door to prevent its use. Additional TPC's were made to SAO-219 following the investigation into the cause of this event. The changes provided instructions on the use of the inner and outer door equalizing valves to relieve pressure differentials inside the airlock and added a note referencing installed gauges that can be utilized to read air lock pressure. These TPC's have been incorporated into revision 10 of SAO-219, which was issued on November 30, 1993. We believe that these measures brought the procedure into full compliance with NRC requirements.

As a result of subsequent reviews, additional guidance on equalization of the airlocks is being included in the next revision of SAO-219, which will be issued by April 1, 1994.

PART B RESPONSE

The purpose of the operational gauge calibration program is to insure that local instrumentation utilized in the operation of the plant is calibrated. The operational gauge calibration program is described in SAO-217 and was administratively controlled and implemented by TP-SQ-11.019 and PMP-1. A previous inspection report, Inspection Report 92-19, dated September 15, 1992, found that WC&PPS gauges used for individual containment penetration pressure indication had not been calibrated every 18 months as required by PMP-1. A violation was also issued in connection with the 1992 inspection, (92-19-02), and the following corrective action were taken as a result of that violation:

- TP-SQ-11.019, the administrative procedure for the calibration and control of operational gauges, was revised in November 1992.
- All of the WC&PPS gauges used for individual containment penetration pressure were calibrated.
- PCV-14, Operating Instrument Calibration PM Program, was drafted in 1992 and was implemented as a replacement of PMP-1 on December 30, 1993. PCV-14 details the implementation of the requirements of SAO-217 and TP-SQ-11.019.

- A comprehensive review of the operating equipment program was conducted. The purpose of the review was to ensure the data base contained all of the required gauges and that the calibration history files were up to date. The operations logs were included in the review to ensure that all of the operating equipment referenced in the logs that is within the responsibility of the Test and Performance section was included in the program. The data base was also expanded to include gauges on the Unit 1 and the Gas Turbine operating logs.

The WC&PPS gauges associated with the containment airlocks had been identified as requiring replacement following the violation in 1992 and were scheduled to be replaced during the 1993 refueling outage. Seven of the eight door seal gauges were replaced. The delta pressure (D/P) gauges were not available by the end of the refueling outage and were therefore not replaced.

The in-depth review of the operational equipment database identified several discrepancies. The operational gauge program requires, as a minimum, that operational equipment which is contained in the operations logs be included in the program. Therefore, it was concluded that operational equipment contained in the operation logs should be given a higher priority when maintaining the data base. As a result, several of the gauges which were not on the operations logs had exceeded their calibration date and some of the history files were not up to date. This review also revealed that the seven WC&PPS gauges installed on the airlocks during the 1993 refueling outage were missing their history files. The data base was revised during August and September of 1993 to correct these discrepancies.

Following the damage to the 80' containment airlock inner door, the following corrective actions were taken:

1. All of the WC&PP gauges associated with the airlocks have been replaced and calibrated.
2. PCV-14, Operating Instrument Calibration PM Program, was issued December 30, 1993 to replace PMP-1 as the implementing procedure for the operating gauge calibration program.
3. The Test and Performance operational equipment calibration data base had been reviewed during the first half of 1993 to insure that gauges required by SAO-217 were included in the data base. During August and September of 1993, the history files of these gauges were updated and by October 1, 1993, all of the gauges that were past due for calibration had been identified. An intensive program to calibrate the overdue gauges is in progress. Gauges that are overdue for calibration are identified in a monthly report to the Manager of Test and Performance.

Therefore, with the exception of placing a label on the gauges to identify them as part of the Test and Performance Operational Gauge Program, we believe that full compliance with the appropriate station procedures has been achieved. It is our plan to have labeling in accordance with our procedures and calibration of in-line and otherwise inaccessible gauges completed following the 1995 refueling outage.