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May 30, 1995

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

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

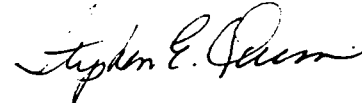
SUBJECT: Reply to Inspection Report 50-247/95-07, Notice of  
Violation

This is in reply to your letter dated April 28, 1995 concerning the  
inspection conducted by Mr. P Patniak from March 20, 1995 to March 24,  
1995.

The attachment to this letter constitutes our response to the Notice of  
Violation included with your letter as Appendix A.

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

Very truly yours,



Attachment

cc: Mr. Thomas T. Martin  
Regional Administrator - Region I  
US Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Francis J. Williams, Jr., Project Manager  
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ATTACHMENT

REPLY TO NOTICE OF VIOLATION

50-247/95-07

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
MAY, 1995

## NOTICE OF VIOLATION

During an NRC inspection conducted from March 20-24, 1995, 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 (1994), the violation is listed below:

10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants under Criterion IX, "Control of Special Processes," states, "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other requirements."

Contrary to the above, the qualification of an NDE Level III individual did not meet the American Society for Nondestructive Testing Recommended Practice No. SNT-TC-1A, 1980 Edition, for Personnel Qualification and Certification in Nondestructive Testing, as required under Paragraph IWA-2300 of ASME Code, Section XI, 1980 Edition, with addenda up to W81, which was the applicable code during qualification in that one specific examination was found to have covered four nondestructive testing methods contrary to the requirement of SNT-TC-1A that requires one specific examination for each method.

This is a Severity Level V Violation (Supplement D)

## REPLY

The specific examinations taken in March 1991 by the NDE Level III individual contained four parts; one for each specific method (magnetic particle, liquid penetrant, radiography and ultrasonics). However, the number of questions in each part contained only five questions in lieu of twenty questions as specified in Con Edison procedure QA-7101 Revision 8 "Nondestructive Testing Personnel Qualification and Certification" and as recommended in SNT-TC-1A (1980 edition). The Level III individual responsible for administering the examination was contacted and does not recall why this particular test format was used in 1991.

The immediate corrective action taken was to administer new "specific" examinations to the subject NDE Level III individual which contained, as a minimum, the required number of questions in the four applicable test methods; magnetic particle, liquid penetrant, radiography and ultrasonics. The NDE Level III individual successfully passed the examinations on March 27, 1995, thereby achieving compliance with the requirements and demonstrating his continuing qualification to perform NDE Level III activities.

Additional evidence that the NDE Level III individual has continually been qualified to perform NDE Level III activities since his employment in January, 1991 is supported by the fact that he received ASNT NDE Level III certifications for magnetic particle, liquid penetrant, radiography and ultrasonics testing in March, 1993. These certifications expire March, 1998. He has maintained such certifications current since 1978.

A review of qualification and certification documentation for current Con Edison NDE personnel for Levels I, II and III will be accomplished to assure that the condition discussed above is not prevalent. This review will be completed by August 31, 1995.

In order to preclude recurrence, the requirement to maintain NDE personnel qualification in accordance with appropriate procedures will be specified in the position guide for the NDE Level III individual responsible for NDE personnel qualifications. This position guide will be revised by August 31, 1995. Additionally by July 1, 1995, this notice of violation will be reviewed and discussed with all Indian Point Unit 1 and 2 NDE personnel.