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February 28, 1996

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

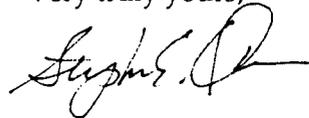
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Washington, DC 20555

SUBJECT: Reply to a Notice of Violation (95-22-01), Inspection  
Report 50-247/95-22

This responds to your January 29, 1996 letter concerning the resident safety inspection conducted by Mr. R. Temps and Mr. B. Westreich from October 29 through December 31, 1995. The attachment to this letter constitutes our response to the Notice of Violation attached as Enclosure 1 to your letter.

Should you or your staff 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  
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**ATTACHMENT**

**REPLY TO A NOTICE OF VIOLATION (95-22-01)  
INSPECTION REPORT 50-247/95-22**

**CONSOLIDATED EDISON COMPANY OF NEW YORK,  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
FEBRUARY, 1996**

## Reply to a Notice of Violation (95-22-01)

### NOTICE OF VIOLATION

The Notice of Violation in Inspection Report 50-247/95-22 is stated as follows:

"During an NRC inspection conducted from October 29, 1995 to December 31, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 60 FR 34381; June 30, 1995), the following violation was identified:

1. Technical Specification section 6.8.1 requires that written procedures be implemented covering activities referenced in Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 requires written procedures that govern procedure adherence. Station Administrative Order (SAO)-133, "Procedure, Technical Specification and License Adherence and Use Policy," Section 5.1.1, states that procedures shall be followed. Station Operating Procedure (SOP)- 29.7, "Nitrogen and Hydrogen to Nuclear Plant," requires nitrogen sparging system valve SGN-41 be maintained normally open in order to supply nitrogen to the isolation valve seal water (IVSW) system.

Contrary to the above, on November 13, 1995, valve SGN-41 was found shut, versus its procedurally required open position, thus isolating sparging system nitrogen from the IVSW System.

This is a Severity Level IV violation (Supplement 1)."

### RESPONSE

As discussed in the inspection report, this event was reported by Con Edison in LER 95-22 which was transmitted by letter dated December 13, 1995. The preliminary investigation for that event had not determined the cause for the mispositioning of valve SGN-41. A final report has since been issued which concludes that three corrective actions taken in response to a previous similar event (reported in LER 94-02) had been ineffective in preventing the LER 95-22 event. Further, although a definite cause for the recent mispositioning of valve SGN-41 could not be determined, the following contributing factors were identified from discussions and interviews with Operations personnel:

1. An apparent lack of understanding on the part of Operators that closing valve SGN-41 places the IVSW System outside its design basis as this action isolates it from its seismically qualified source of nitrogen.

## Reply to a Notice of Violation (95-22-01)

2. Since no documentation could be found to address the repositioning of the valve, the system lineup may have been changed without the use of one or more of an approved procedure, an approved Operating Instruction, and/or without notation of the evolution in the Nuclear log.
3. Labeling of essential equipment used for nitrogen supply to the IVSW System with a name ("Sparging Bottles") that does not relate to the essential use (IVSW System nitrogen supply).
4. Procedure (PCO 1, "Plant Heatup to 200°F") requires further revision to provide the operators a clear procedural flow path to ensure proper alignment.

A number of corrective actions, in addition to the immediate actions reported in LER 95-22, have been scheduled as follows:

1. Add valve SGN-41 to the locked/sealed valve check-off list COL 99, "Administrative Sealed Valves", which is currently performed quarterly. A temporary procedure change was implemented on 1/26/96 and the change is scheduled to be incorporated into COL 99 by 4/24/96.
2. Reinforce plant policy with Operators on the use of Operating Instructions for all system alignments performed outside of approved established procedures. This action is scheduled for completion by 4/30/96.
3. Retrain licensed and non-licensed operators, during Operator Requalification Training, on the IVSW System normal and backup nitrogen supplies, design basis, and system operations. This action is scheduled for completion by 3/31/96.
4. Re-name the "Sparging Bottles" to "IVSWS Primary N<sub>2</sub> Supply" or a name that indicates its main function. This action is scheduled for completion by 4/30/96. Affected procedures will subsequently be revised consistent with the name change.
5. Operations management will reinforce with the Operations staff the requirements and flow path for completed paperwork related to operational activities performed by Operations. This action is scheduled for completion by 3/30/96.

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6. Revise PCO 1 to specify the alignment of 10 nitrogen cylinders (from the currently named "Sparging System") to the IVSW System as identified in COL 10.4.1, "Isolation Valve Seal Water System Operation". A temporary procedure change was implemented on 1/25/96 and the change is scheduled to be incorporated into PCO 1 by 4/16/96.
7. Review a sampling of Maintenance Rule risk significant systems to determine if isolation or opening of other single (not locked or sealed) valves would place the plant outside of the design basis. This action is scheduled for completion by 6/30/96.