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March 12, 1998
Re: Indian Point Unit No.2
Docket No.50-247

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

SUBJECT: Reply to Notice of Violation: Inspection Report 50-247/97-15

This letter and attachment constitute Con Edison's reply to the Notice of Violation (NOV) set forth as Enclosure 1 to NRC's February 10, 1998 letter transmitting Inspection Report 50-247/97-15 based upon the inspection conducted from November 21, 1997 through December 31, 1997 at the Indian Point 2 facility.

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

Very truly yours,

Paul H. Kinkel

C: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
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Mr. Jefferey F. Harold, Jr., Project Manager

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departmental directive(s) in place at the time of the inspection allowed the use of an Investigative Check List (ICL) to facilitate their replacement. The ICL documents the "as-found" condition, a description of work performed, measurement and test equipment (M&TE) calibration data, materials and special equipment used, and the "as left" description.

The referenced work orders, NP-97-94036 and NP-97-93593, were completed on August 25, 1997 and October 7, 1997 respectively. These work order completion dates are prior to our November 6, 1997 response to Inspection Report 50-247/97-08 Notice of Violation that acknowledged the need for performance improvement that would include procedural enhancements. As indicated in our responses to Inspection Reports 97-08 and 97-11, the management attention currently being applied is intended to lead to performance improvements in the plant. Activities to comprehensively address procedural adherence matters are currently under review. Regarding the specifics of this NOV, the Administrative Directive for procedural guidance for repairs, implemented by the Instrument and Controls department, is being revised with an anticipated completion date of March 31, 1998. Training for this new requirement is intended to be completed by April 30, 1998.