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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
475 Allendale Road
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ATTACHMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MARCH 1998

RESPONSE TO NOTICE OF VIOLATION

VIOLATION I.

Technical Specification (T.S.) Section 6.8.1 requires that written procedures be implemented covering activities referenced in Regulatory (Safety) Guide 1.33, November 1972. Appendix A of Regulatory Guide 1.33 recommends 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. SAO-251, "Conduct of Maintenance," requires that maintenance that can affect the performance of the plant be conducted in accordance with procedures, work step lists, travelers, documented instructions, and approved drawings.

Contrary to the above, during the inspection period ending December 31, 1997, the NRC identified that work orders originally issued for troubleshooting component problems were also used to perform safety related maintenance without required procedures, work step lists, travelers, documented instructions, and approved drawings. Specifically, in August of 1997, work order NP-97-94036 issued for troubleshooting on the 22 steam generator cold leg temperature indication resulted in replacement of power supplies, parts in a current repeater, and a current to current converter; and work order NP-97-93593 issued for troubleshooting on the 24 steam generator low flow regulating valve resulted in replacement of capacitors, an output meter, and a control potentiometer.

This is a Severity Level IV violation (Supplement I)

RESPONSE:

Con Edison acknowledges that SAO-251, "Conduct of Maintenance," requires that maintenance that can affect the performance of the plant be conducted in accordance with procedures, work step lists, check lists, travelers, documented instructions, and approved drawings". However, SAO 251 Section 1.0 , "Intent," indicates that specific requirements regarding the conduct of maintenance are provided in Station Administrative documents, Corporate Policies and Instructions, and various work group directives and procedures. Regarding the use of procedures during the repair and replacement of component parts (i.e.; control potentiometer, output meter, capacitors, power supplies, current repeater and a current to current converter) the

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.