

Paul H. Kinkel
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10611
Telephone (914) 734-5340
Fax: (914) 734-5923

April 9, 1998

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

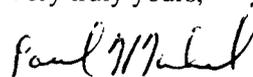
Document Control Desk
Office of Nuclear Reactor Regulation
Mail Station PI-137
Washington, DC 20555

SUBJECT: Revised Reply to Notice of Violation, NRC Inspection Report No. 50-247/97-12

The attachment to this letter comprises Consolidated Edison Company of New York's ("Con Edison") revised reply to Violation A in the December 23, 1997 Notice of Violation ("NOV") contained in Inspection Report No. 50-247/97-12.

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

Very truly yours,



Attachment

9804230220 980409
PDR ADOCK 05000247
Q PDR

11
1101

cc: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

ATTACHMENT

REVISED REPLY
VIOLATION A
NOTICE OF VIOLATION
INSPECTION REPORT NO. 50-247/97-12

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

REPLY TO NOTICE OF VIOLATION

Violation A.

Technical Specification (TS) 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. System Operating Procedure (SOP) 1.7, "Reactor Coolant System Leakage Surveillance," Section 4.4.1, states, in part, that if reactor coolant system unidentified water inventory leakage has increased by 0.5 gallons per minute (gpm) or exceeded the TS limit, a safety evaluation shall be performed in order to update the identified leakage values and sources, and to identify the source of the increased leakage.

Contrary to the above, on October 21, 1997, operators failed to initiate a safety evaluation and identify the source of increasing leakage when the reactor coolant system unidentified water inventory leakage was recorded as 1.1 gpm, which exceeded the TS limit of 1.0 gpm.

Reply to Violation A.

We concur that the operators did not adequately perform the safety evaluation as required by Section 4.4.1 of SOP 1.7 when the reactor coolant system (RCS) leak rate exceeded the TS limit of 1.0 gpm. This event occurred during a plant cooldown on October 21, 1997. The calculated RCS inventory balance leak rate had increased from 0.23 to 1.13 gpm over a 16 hour period, while no significant changes were noted on RCS inventory readings, such as makeup and letdown flows and pressurizer and volume control tank levels. On the following day, the RCS leak rate was calculated to be 0.3 gpm (this calculated leak rate had been performed within 10 hours after the calculated leak rate that obtained 1.13 gpm). The TS Limiting Condition for Operation (LCO), which requires placing the plant in cold shutdown within 30 hours of identification of the RCS leak rate exceeding 1.0 gpm, was not exceeded. During this period, the plant was already being brought to cold shutdown. The plant had been at hot shutdown since October 14, 1997. Cold shutdown was achieved on October 25, 1997.

A review of historical leak rate data indicated that during periods of significant RCS heatup, cooldown, or inventory diversion, uncertainties can be introduced into the leak rate calculation, resulting in a higher than expected leak rate value. As a result, for this event, the operators concluded that the higher leak rate was in fact due to temperature changes in the RCS. A review of computer records indicated an increase in the containment sump leak rate, which is indicative of an increased RCS leak rate, during the October 21, 1997 plant cooldown. Section 4.4 of SOP 1.7 states that the operator will perform a safety evaluation if the determined leakage has increased above the TS limit or has increased by 0.5 gpm or more since the previous RCS leakage determination. This procedural direction was not followed, because the operators incorrectly concluded that the higher than expected leak rate value was due to RCS temperature changes. During these evolutions, the uncertainty of leak rate calculation data, such as levels or diversions could impact the results more than RCS temperature compensation.

R

R

R

REPLY TO NOTICE OF VIOLATION

This event was reviewed with Operations personnel by the Operations Manager. The following items will be implemented prior to returning the plant to service:

- Operations Department error reduction training and reinforcement of the standards for use of error reduction tools.
- Operations Department standards for strict procedure adherence reviewed, enhanced, and reinforced.
- In order to further improve communications, procedural adherence, and conduct of operations within the Operations organization, an Operations mentor program has been implemented. These mentors will directly communicate strengths and areas for improvement to Operations control room personnel on the shifts. These mentors will also provide feedback on the strengths and areas for improvement of Operations control room personnel, as well as, recommending programmatic and process improvements that will enhance Operations performance.
- This response will be required reading for Operations personnel.

R