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June 5, 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: Revised Reply to Notice of Violation: Inspection Report 50-247/97-15

In accordance with the request of the Senior Resident Inspector, the attachment to this letter provides Con Edison's revised and clarified 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

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ATTACHMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JUNE 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 the performance of activities associated with the referenced work orders, NP-97-94036 and NP-97-93593 did not utilize a formal corrective maintenance procedure as indicated by Regulatory Guide 1.33 as referenced in Technical Specification (T.S.) Section 6.8.1. Con Edison further 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. 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. The level of detail incorporated into a maintenance procedure is determined by task complexity, task frequency, consequence of error, and past experience with components involved. Instruments and Controls (I&C) Administrative Directive (ICAD-4), "Procedure for Performing Maintenance" specified that investigative check lists ("ICL's") may suffice for routine or minor maintenance where detailed step-by-step procedures are not considered necessary due to skill normally possessed by qualified maintenance personnel.

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 led to the lack of rigor and formality in documenting the performance of safety-related repairs subsequent to troubleshooting. The apparent incongruity in TS 6.8.1 and ICAD-4 documentation requirements for the use of formal repair procedures is believed to be the cause for the subject violation.

The ICL's used to perform the subject work did document 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. Con Edison acknowledges that the ICL's used did not provide precautions and limitations that would identify unexpected or adverse conditions to safety resulting from, or during, the performance of these work activities. I&C Supervisor review was completed subsequent to the performance of the work to ensure that components repaired and replaced were consistent with the identified work scope. Calibration of these devices established that performance and indications were satisfactory.

To preclude recurrence of events identified by this NOV, the administrative directives for procedural guidance for repairs implemented by the Instrument and Control section (ICAD-4, Rev.12, "Procedure for Performing Corrective Maintenance" and ICAD-16 Rev. 0, "I&C Trouble Shooting Procedure") have been revised and issued. Training for the revised corrective maintenance procedure requirements has also been completed. The ICAD revisions and training thereon are the corrective actions that are expected to preclude recurrence.