

October 7, 1998

EA 98-367

Mr. A. Alan Blind
Vice President - Nuclear Power
Consolidated Edison Company of
New York, Inc.
Indian Point 2 Station
Broadway and Bleakley Avenues
Buchanan, NY 10511

SUBJECT: INDIAN POINT UNIT NO.2 INSPECTION REPORT NO. 50-247/98-10 (REPLY)

Dear Mr. Blind:

This letter refers to your September 14, 1998 correspondence, in response to our notice of violation dated August 14, 1998 and our integrated inspection report dated July 15, 1998. This inspection focused on the maintenance rule baseline program (June 8, 1998 through June 12, 1998) at the Indian Point Unit No. 2 Station, Buchanan, New York. We have reviewed this matter in accordance with NRC Inspection Manual Procedure 92902, "Maintenance." We concur with your assessment of the root cause and corrective action as summarized below and we note the cause for the violation being human error that resulted from your initial incomplete understanding of the requirements and initial inability to remain current in evolving NRC expectations in this area.

The violation involved a failure to include within the scope of the maintenance rule program, several control room annunciator functions at the time of the inspection. As noted during the time of the inspection, a total of 17 alarms had been previously identified by you as being within the scope of the rule, however the expert panel had yet to review and approve their inclusion into the program. The immediate corrective action was to again review the program scope to ensure that all applicable control room annunciators were included within the scope of the maintenance rule. //

We consider the actions you have taken to be acceptable and will further review the effectiveness of these actions in a future inspection.

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Mr. A. Alan Blind

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We appreciate your cooperation.

Sincerely,

Richard J. Conte, Chief
Operator Licensing and
Human Performance Branch
Division of Reactor Safety

Docket No.: 50-247
License No.: DPR-26

cc w/encl:

N. Carns, Senior Vice President - Nuclear Operations
J. Baumstark, Vice President, Nuclear Power Engineering
G. Hutcherson, Chief Nuclear Engineer
C. Jackson, Manager, Nuclear Safety and Licensing
B. Brandenburg, Assistant General Counsel
C. Faison, Director, Nuclear Licensing, NYPA
J. Ferrick, Operations Manager
D. Murphy, Work Control Manager
C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law
P. Eddy, Electric Division, Department of Public Service, State of New York
T. Rose, Secretary - NFSC
F. William Valentino, President, New York State Energy Research
and Development Authority
J. Spath, Program Director, New York State Energy Research
and Development Authority

Mr. A. Alan Blind

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A. Alan Blind
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5718
blinda@coned.com

September 14, 1998

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

**SUBJECT: REPLY TO NOTICE OF VIOLATION (98-10-01), Inspection
Report 50-247/98-10**

The attachment to this letter constitutes Consolidated Edison Company of New York, Inc.'s (Con Edison) Reply to the Notice of Violation included with your July 15, 1998 letter, as revised by your August 14, 1998 letter, which transmitted the results of the NRC inspection conducted from June 8 through June 12, 1998 at the Indian Point 2 facility. Your inspection focused on the review of our implementation of the maintenance rule program in accordance with 10 CFR 50.65.

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

Very truly yours,

A. Alan Blind

Attachment

~~9809280349~~

c:

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

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

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

ATTACHMENT

REPLY TO NOTICE OF VIOLATION

INSPECTION REPORT 50-247/98-10

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
September 1998

NOTICE OF VIOLATION

During an NRC inspection conducted from June 8 through June 12, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, revision 1, the violation is listed below:

10 CFR 50.65(b)(1) requires, in part, that the holders of an operating license shall include within the scope of the monitoring program specified in 10 CFR 50.65(a)(1), safety-related structures, systems and components (SSCs) that are relied upon to remain functional during and following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shutdown the reactor and maintain it in a safe shutdown condition, and the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the 10 CFR Part 100 limits. The scope also includes non safety-related SSCs that are relied upon to mitigate accidents or transients, or are used in the plant emergency operating procedures, or whose failure could prevent SSCs from fulfilling their safety-related function, or whose failure could cause a reactor scram or actuation of safety-related systems.

Contrary to the above, between July 10, 1996 and June 8, 1998, the licensee failed to include several control room annunciator functions within the scope of the maintenance rule at the time of this inspection. A total of 17 alarms were identified that should have been included within the maintenance rule since these alarms are addressed in the emergency operating procedures.

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

Response to Violation

Con Edison accepts the stated violation. The reason for this violation was an insufficient initial understanding and interpretation of the intent of 10 CFR 50.65 (b)(2)(I). The regulation requires that we include non-safety related structures, systems, and components that are relied upon to mitigate accidents or transients or which are used in plant emergency operating procedures in the maintenance rule monitoring program. The Indian Point Unit No. 2 maintenance rule expert panel has the responsibility for determining the risk significance of those systems, structures, and components to be included in the program. The expert panel is a nine-member committee composed of Con Edison nuclear power personnel with expertise in operations, maintenance, engineering, safety analysis and risk assessment. While many of the non-safety related central control room (CCR) annunciators were identified within the maintenance rule scope, several proposed annunciator additions to the maintenance rule basis document had not yet been approved by the expert panel and therefore were not in the program at the time of your inspection. These scoping omissions were identified by Con Edison with the appropriate corrective actions already in progress prior to the NRC inspection. The CCR Annunciator System Basis Document, Revision 1, was approved by the maintenance rule system engineer and

coordinator in May 1998, and by the expert panel on June 17, 1998.

The immediate corrective action taken in response to this violation was to review the program scope to ensure that all applicable control room annunciators are included within the scope of the maintenance rule. The control room annunciators cited by this violation have been included within the maintenance rule since these annunciators are addressed in the emergency operating procedures.

To prevent a recurrence of this type of event, revised maintenance rule program procedures and processes with respect to scoping have been implemented. Additional training and review regarding the maintenance rule scope has been provided to appropriate staff personnel.

The above-mentioned corrective actions were fully implemented as of June 17, 1998.

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