

APPENDIX A

NOTICE OF VIOLATION

Consolidated Edison Company of New York, Inc.

Docket Nos. 50-3  
50-247

Based on the results of an NRC inspection conducted on May 16-18 and May 22-23, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your NRC Facility License Nos. DPR-5 and DPR-26, as indicated below. Item A is categorized as an Infraction. Items B through E are Deficiencies.

- A. Section 5.4.1 of the Environmental Technical Specification Requirements (ETSR) requires, in part, that detailed written procedures be prepared and followed for all activities involved in conducting the environmental monitoring program.
1. Procedure QSR 410 requires, in part, that the department responsible for the audited activity respond to Quality Safety and Reliability (QSR) within 30 days of receiving the audit report, outlining proposed corrective action to correct identified deficiencies.
  2. Procedure IPC-I-32, Rev. 1, "Temperature Recorder (Partlow Procedure)" requires, in part that calibration of the temperature sensors be performed each six months by withdrawing the probes from the intake or discharge and placing them in a bucket of water with a calibrated thermometer and comparing the outputs at several points.
  3. The annual calibration of the temperature sensor systems for the plant cooling water system and the monthly functional testing of the temperature sensor systems are environmental monitoring activities required by the ETSR.

Contrary to these requirements,

1. As of May 23, 1978 the Environmental Protection Committee (EPC) failed to respond to QSR outlining proposed corrective actions to correct identified deficiencies relative to QSR Audit Report 77-A10, "Audit of Indian Point ETSR - Thermal Discharges," dated June 2, 1977 and transmitted to the EPC by letter dated June 23, 1977. While the Nuclear Power Generation Department received a draft of the above audit prior to

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June 23, 1977 and responded by letter to the EPC with a copy to QSR on January 6, 1978, the response exceeded the 30 day response requirement and did not outline the specific proposed corrective actions to be taken to correct audit identified deficiencies.

2. Since December 1975 the intake temperature probe of the Partlow system had been calibrated at six-month intervals using a technique other than described by calibration procedure IPC-I-32, Rev. 1.
  3. Detailed, written and approved procedures were not prepared for the annual temperature sensor system (Bendix system) calibration, nor for the required monthly temperature sensor system functional tests.
- B. Section 5.6.2.2.a of the ETSR requires, in part, that if a confirmed measured level of radioactivity in any environmental medium exceeds ten times the control level, a written report be submitted to the NRC within 10 days after confirmation. Confirmation by resampling and/or reanalysis, as appropriate shall be completed at the earliest time consistent with the analysis, but in any case within 30 days.

Contrary to this requirement, an anomalous measurement report, relative to levels of I-131 in excess of ten times the control levels, in a March 27, 1978 Camp Field Reservoir sample was not submitted to the NRC until June 9, 1978, an interval in excess of ten days after the measured level was confirmed by reanalysis and in excess of 30 days after the medium was resampled on April 11, 1978.

- C. Section 5.4.2 of the ETSR requires, in part, that temporary changes to procedures be reviewed by and approved by the EPC within 30 days after implementation.

Contrary to this requirement, temporary procedure changes, which were made in the fish biocharacteristics sampling program, including Texas Instruments, Inc. designated change numbers 78-1 and 78-3 and which were implemented by April 15, 1978, were not reviewed by nor approved by the EPC as of May 23, 1978, an interval exceeding 30 days.

- D. Sections 3.1.1.1 and 3.1.4.1 of the ETSR require, in part, that the individual water intake temperatures be monitored continuously and that the rate of change of  $\Delta T_c$  be determined and recorded for all flow conditions.

Contrary to this requirement, at the time of inspection the intake temperature sensors for Units 1 and 2 were inoperable and the rate of change of  $\Delta T_c$  was not recorded for all flow conditions (continuously).

- E. Section 3.1.1.6 of the ETSR requires that an annual channel calibration and monthly function tests of the temperature sensor systems be performed.

Contrary to this requirement, as of May 23, 1978, the calibrations of the temperature system did not include the sensor systems and monthly functional tests of the sensor systems had not been performed since September 1977.