

John D. O'Toole
Assistant Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-2533

January 7, 1981

Indian Point Unit Nos. 1 & 2
Docket Nos. 50-03, 50-247

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission, Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier

This refers to combined Inspection 50-03/80-01 and 50-247/80-10, conducted by Mr. T.J. Jackson, Radiation Specialist, on July 21-25, 29-30 and August 4-8, 1980, of activities authorized by NRC License Nos. DPR-5 and DPR-26 at Indian Point Station. Your November 25, 1980 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to these items of non-compliance is presented in the attached Appendix A.

Your letter also asked that we address those actions taken or planned to ensure that identified items of non-compliance will be corrected and will not recur. The importance of promptly correcting items of non-compliance and preventing recurrence of these items is recognized by Con Edison. With regard to this concern the following actions have been taken:

1. The subject Inspection Report and in particular the details of Item C in the Notice of Violation were discussed with appropriate personnel at a meeting with the Manager, Nuclear Power Generation Department. Furthermore, this report was also reviewed and discussed at a meeting of the Station Nuclear Safety Committee. During both these meetings the need to promptly correct and to prevent recurrence of identified items of non-compliance was emphasized.

8102060 056

Mr. Boyce H. Grier
Director

-2-

January 7, 1981

2. The subject Inspection Report was routed to all subsection heads for information and action as appropriate.
3. The Retraining Program for licensed plant personnel now includes a discourse on the importance of correcting the items of non-compliance and preventing the recurrence of non-compliance.

These actions provide further assurance against recurrent and uncorrected items of non-compliance.

Very truly yours



John D. O'Toole
Assistant Vice President

Attachment

CC: Mr. T. Rebelowski, Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, New York 10511

Appendix A

Item A Response:

The analysis of drinking water and surface lake water samples for Sr-90, as required by Table 4.2-1 of the ETSR, was omitted in 1979 through an oversight in Program management. As noted by your inspector, this requirement was fulfilled in both 1978 and 1980. In order to prevent a recurrence of this item, we are in the process of finalizing a computer program which will "flag" both required and overdue analyses. We expect that this computer program will be operational for the 1981 NEM Program year. In addition, Program management has been reminded of the necessity of adhering to both the sampling and analytical requirements of Table 4.2-1.

Item B Response:

The delay in implementing the changes in the ETSR relative to collecting and analyzing drinking water samples from Station No. 26, the New York City aqueduct, was attributable to a delay in communicating this ETSR change within Consolidated Edison. Notification of this Technical Specification change was not forwarded to NEM Program management in a timely manner. In order to prevent a recurrence of this item, discussions have been held between NEM Program management, responsible for implementing such ETSR changes, Nuclear Engineering and Nuclear Power Generation personnel responsible for disseminating such information. Assurances have been given that upon receipt of such information all distribution channels will be used to transmit this information to the affected parties directly and immediately.

Item C Response:

This item was the result of recurrent plugging of the pen and associated capillary tubing of the subject recorder. The recorder has been repaired.

In order to ensure future compliance we are investigating recorder modifications which would include either an improved inking system or a printing system which does not employ ink. Until these modifications are complete, the existing recorder has been placed on a weekly preventive maintenance program.