

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Report No. 50-247/81-09

Docket No. 50-247

License No. DPR-26 Priority -- Category C

Licensee: Consolidated Edison Company of New York, Inc.

4 Irving Place

New York New York 10003

Facility Name: Indian Point Nuclear Generating Station, Unit 2

Inspection At: Buchanan, New York

Inspection Conducted: April-2-3, 1981

Inspectors: H.B. Kister 4/8/81
H. B. Kister, IE:RI date

J. E. Rebelowski, IP NRC SRI 4/8/81
date

L. Olshan, NRR 4/8/81
date

G. Rivenbark, NRR 4/8/81
date

Approved by: E.J. Brunner 4/8/81
E. J. Brunner, Chief, Reactor Projects date
Branch #1, DRPI

Inspection Summary:

Inspection on April 2-3, 1981 (Inspection Report 50-247/81-09)

Areas Inspected: Special, announced inspection (44 hours) by an NRC:IE/NRR team (4 persons) to examine selected aspects of the implementation of the licensee's revised management structure which was developed after their review of the events leading to the accumulation of water inside the Indian Point Unit 2 containment.

Results: No items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

- *E. R. McGrath, Senior Vice President, Power Generation
- *C. W. Jackson, Vice President, Nuclear Power
- J. D. O'Toole, Vice President, Nuclear Engineering and QA
- W. A. Monti, General Manager, Nuclear Power Generation
- D. M. Rich, General Manager, Technical Support
- *K. Burke, Director, Regulatory Affairs
- L. Kawula, Nuclear Training Director
- D. Army, Maintenance Engineer
- N. Hartman, Chairman, On Site Review Group
- D. Hugo, Shift Technical Advisor

*Attended Exit Interview on April 3, 1981

During the course of the inspection, other licensee staff members were also interviewed.

2. The purpose of this inspection was to review and assess the implementation of Consolidated Edison's revised organization and personnel assignments which were developed after their review of the events leading to the accumulation of water in Indian Point Unit 2 containment. Particular emphasis was placed on those changes and assignments that differed significantly from the previous organization and how the changes would result in improvement. The revised organization was approved by the NRC in Amendment 68 to the Technical Specifications dated March 27, 1981.

3. Licensee Action on Previous Inspection Findings

None reviewed.

4. Organization and Staffing Review

Consolidated Edison staff orally presented the details and purpose of the revised organization including arrangement, responsibilities, and authorities. The principal changes and improvements were also discussed. The assessment was conducted based on the above presentation, interviews of selected personnel, and review of the below listed documents:

a. Documents Reviewed

- (1) NUREG 0731, Utility Management and Technical Competence, dated September 1980.
- (2) Indian Point Unit 2 Technical Specifications Amendment 68, dated March 27, 1981.

- (3) Consolidated Edison Site Organization Chart (undated)
- (4) Consolidated Edison Document Titled Indian Point Organization/Responsibilities

b. Findings

- (1) The basic organizational structure embraces the multi unit organization concept described in NUREG 0731 with the exception of Quality Assurance which now reports, in its entirety, to the off site organization. The revised organization accomplished the following:
 - (a) Replaced the former senior on site manager with a corporate level manager (located on site) who reports to the Senior Vice President, Power Generation.
 - (b) Reorganized the three functions of technical engineering, training, and operation, formerly reporting to the previous senior manager, under four general managers; Nuclear Power Generation, Environmental Health and Safety, Technical Support, and Administrative Services.
 - (c) Removed the functions of Security, Refueling Engineer, Test Performance, and Chemistry and Radiation Safety Director that formerly reported to the Plant Manager, and placed them under the new General Managers.
 - (d) The new General Manager, Nuclear Power Generation replaced the former Plant Manager and now manages operations, maintenance and instrument and control functions. This reduces significantly the number of functions formerly under the Plant Manager, and permits him to place greater effort in managing these areas.

It is believed that these changes have placed greater management focus on plant operations and support activities and will enhance safe operation of the plant.

- (2) Additional changes which the licensee made to improve the organization were also reviewed, they include:
 - (a) Addition of a Director of Communications and Regulatory Affairs and Staff reporting to the Vice President Nuclear Power. His duties include liaison with the NRC Resident Inspector, feedback mechanism monitoring, coordinate responses to NRC inspection findings, regulatory bulletins, circulars, and orders, assure operating experiences are provided to the plant staff and that it is incorporated into plant procedures and training programs.

These duties were formerly the responsibility of the Technical Engineering Director.

- (b) Addition of a Technical Consultant reporting to the Vice President, Nuclear power.
- (c) Shifted responsibility for handling contaminated waste from the Maintenance Dept. to a new radwaste section under the General Manager, Environmental Health and Safety.
- (d) Expanded the Maintenance Department to include a maintenance planning and scheduling section and a new section devoted entirely to gas turbine maintenance. The licensee also plans to expand the number of maintenance personnel.
- (e) Addition of a new General Manager, Technical Support, with an expanded technical staff to provide greater technical expertise on site. The STA's now report to this general manager. The licensee is actively staffing this department. The minimum staffing required by the Technical Specifications will be accomplished prior to restart of the unit.
- (f) Development of an expanded training staff and program including development of a 5-year training program with particular attention to the maintenance department activities.
- (g) Addition of staff engineers and personnel for the purpose of reducing the administrative duties of managers.

It is believed that the above changes will further permit greater attention toward the operation of the plant by the managers and further enhance safety.

- (3) Seven Consolidated Edison personnel, consisting of the Vice President, Nuclear Power, General Manager, Technical Support (now the Chairman of the Station Nuclear Safety Committee), General Manager, Nuclear Power Generation, Maintenance Engineer, Training Director, a Shift Technical Advisor, and the Chairman of the On Site Review Group,¹ were individually interviewed to discuss their responsibilities, and authority, and their attitudes regarding the safe operation of the plant. They also provided specific comments regarding their views on the new organization. The qualifications were also examined for those individuals who had not been previously reviewed. The qualifications of the individuals reviewed appear to meet or exceed the requirements of ANSI N18.1 1971.

¹ This on site review group was established in accordance with the February 11, 1980 Confirmatory Order and reports off site to the Senior Vice President, Nuclear Generation.

Based on the above interviews, the indications were that there was an excellent understanding of their functional responsibilities and authority, an enhanced awareness for the need to fully evaluate and understand operating events and that safety will continue to be a primary concern in operating the plant.

No items of noncompliance or deviations were identified.

5. Exit Interview

The inspectors met with the licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on April 3, 1981. The findings of the inspectors were presented and the licensee representatives acknowledged these findings.