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Vice President

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May 25, 1983

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

Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

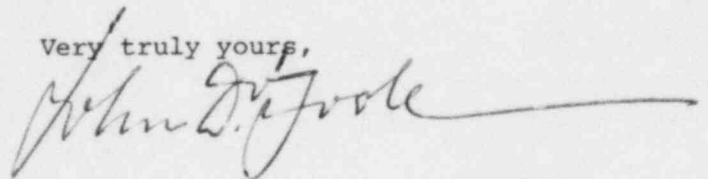
Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/83-10 conducted by Messrs T. Foley and P. Koltay of your office on March 2 through April 4, 1983 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your April 25, 1983 letter stated that it appeared that three 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 the items of non-compliance is presented in Attachment A to this letter.

In addition, your letter also identifies a Notice of Deviation. Our response to this Notice of Deviation is presented in Attachment B to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



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Attachment A

Response to Notice of Violation

Appendix A

Violation A:

Technical Specification 3.13.C.1 requires that penetration fire barriers between the cable spreading room and the control room be functional at all times, and if not functional, a continuous fire watch shall be established or operability of fire detectors verified and an hourly fire watch patrol established.

Contrary to the above, during the period from January 1, 1983 to March 17, 1983, numerous fire barriers in the cable spreading room were not functional, and a continuous fire watch was not stationed nor were fire detectors verified operable and an hourly fire watch established.

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

Response:

Immediately following the determination that certain fire barriers in the cable spreading room were not functional, a continuous fire watch (per Technical Specification 3.13.C.2.a) was established in the cable spreading room and adjoining cable tunnel. Upon verification of the operability of the smoke detectors in these areas, an hourly fire watch patrol was established.

A special survey of all the Technical Specification Fire Barriers was initiated to determine their status. This survey is continuing. Maintenance Work Requests are being issued as

necessary to perform the maintenance on any deficiencies as they are noted from the survey. Central Engineering is investigating alternate materials and the feasibility of repairing or replacing the existing penetration seals with the alternate material. The fire watch patrol is being continued until all the special survey and any required corrective actions are completed.

The surveillance program will be revised by July 1, 1983 to include a change in frequency from 18 months to quarterly.

Violation B

10 CF50, Appendix B, Criteria III and V require measures to be established to translate requirements into procedures, that the procedures be appropriate to the circumstances, and the activity affecting quality be accomplished in accordance with these procedures.

Consolidated Edison Corporate Instruction CI-240, Quality Assurance Program for Operating Nuclear Plants, Supplement 2, requires maintenance procedures to include fire protection requirements as applicable.

Contrary to the above, no procedures were established for the repair and maintenance of existing fire barrier penetrations.

This is a Severity Level IV Violation.

Response:

Maintenance Administrative Directive (MAD)-4, "Procedures for Performing Maintenance" and MAD-5, "Conduct of Maintenance" permit the use of an approved procedure, work step list or investigative checklist on any Class "A", Class "FP", or Class "MET" system or component. Fire barriers are considered a Class "FP" component and when station maintenance or repair is performed on fire barriers and an approved work step list is used which references United Engineers and Contractors drawing 9321-F-3107.

Our program of corrective action for all fire barriers work consists of near term and long term measures.

In the near term, Station Administrative Order (SAO)-114 "Fire Protection and Prevention" is being revised to specify required action for any work on fire barriers. The revisions include a

list of fire barriers, notification requirements for breached fire barriers, corrective action and repair and installation procedure guidelines and references. The SAO-114 Revision is scheduled for June 22, 1983.

As part of a long term comprehensive program to address all Fire Protection requirements at Indian Point, Central Engineering is developing guidelines for all fire protection work. An interim procedure will be issued for the repair of existing fire barrier penetrations in the cable spreading room and control room. The interim procedure will be issued by September 1, 1983.

The final procedure will address requirements for future fire protection work as well as periodic inspections, maintenance, repair or replacement of existing fire barriers and will be commensurate with our January 10, 1983 fire protection submittal. We are scheduling completion of this procedure by December 31, 1983.

Revisions to SAO-114 to implement this program will be made as necessary.

Violation C:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained that meet or exceed the recommendations of Regulatory Guide 1.33. Regulatory Guide 1.33 requires procedures to be established for the control and processing fo radioactive waste.

Contrary to the above, on March 30, 1983 activities involving the processing of radioactive waste were in progress without the establishment or use of a procedure.

This is a Severity Level IV Violation.

Response:

Procedures which address the preparation and shipment of radioactive waste had been established prior to the incident of 30 March 1983. These procedures generally restrict the presence of liquids in our shipping containers. In this instance, workers were attempting to drive off moisture contained in low specific activity radioactive waste in a 55 gallon steel drum through the use of electric drum heating straps, thereby assuring compliance to existing procedures. However, the use of drying mechanisms to assure compliance was not specifically addressed in the existing procedures.

Immediately following the incident, the use of these and similar heating devices were discontinued until appropriate procedures and reviews are implemented.

Attachment B

Response to Notice of Deviation

Appendix B

Deviation:

Consolidated Edison's letters dated September 18, and October 31, 1978 to the NRC, Director of Nuclear Reactor Regulation, clearly indicate the licensee's commitment to Appendix A to Branch Technical Position 9.5.1, Section D-3. Page P5-5 of the licensee's response to staff position P5 dated September 18, 1978, states in part: "In summary....all critical fire barriers will be upgraded to include Marinite collars and sleeves. Critical fire barriers include those between the....and the Indian Point 2 Diesel Generator Building and Electrical Tunnel."

Contrary to the licensee's commitment to Appendix A of the Branch Technical Position 9.5.1, "Guidelines for Fire Protection for Nuclear Power Plants," all critical fire barriers between the Diesel Generator Building and the Electrical Tunnel were not upgraded to include Marinite collars and sleeves.

Response:

Marinite sleeves and collars were required only for cable tray penetrations and not conduits. The intent of the marinite for the cable tray was to provide mechanical support of the Flamemastic. The original design of our fire stops was intended to interrupt combustible paths (i.e., cable insulation). On this basis metallic bus ducts are not provided with any fire stops.

Conduit penetrations identified by the inspector between the diesel generator building and the electrical tunnel have been sealed with a combination of fiberglass and Flamemastic. United Engineers and Constructors Drawing 9321-F-3107, "Cable Tray Miscellaneous Details", is being updated to include detailed

guidance regarding the location of the critical fire barriers. This is expected to be completed by the end of June 1983.

Penetration fire barriers necessary for protection of safe shutdown capability in accordance with Section III.G of Appendix R have been evaluated as presented in our January 10, 1983 submittal. In addition, based on this submittal, a comprehensive program, as mentioned in the response to Violation B, is being established and will include conduit, electrical duct, piping and mechanical duct penetrations of fire barriers. As a result of this effort, we will revise surveillance and maintenance procedures as necessary.