

John D. O'Toole
Vice President

SAFEGUARDS INFORMATION

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

April 19, 1982

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

Mr. R. W. Starostecki, Director
Projects Branch No. 1
Division of Resident and Project Inspection
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/82-03, conducted by Mr. T. Rebelowski, Senior Resident Inspector, on February 1-28, 1982 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2.

Your March 19, 1982 letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements, as set forth in the Notices of Violation enclosed with your letter as Appendices A and B. Con Edison's responses to the items of non-compliance are presented in Attachments A and B to this letter.

Your letter also expressed concern about the implementation of Con Edison's management control systems with regard to our surveillance test program. You requested we describe, in particular, those actions taken or planned to improve the effectiveness of our surveillance test program. We have already taken certain actions to improve the surveillance test program and we are conducting a review of the program to determine what, if any, additional steps should be taken to improve the program. To insure appropriate follow-up of problems identified as a result of the surveillance program, a system has been implemented to identify and track such problems to resolution.

The surveillance program will be reviewed with the aim of identifying elements of the program that require strengthening. Con Edison will take appropriate action to remedy any deficiencies identified. Technical Specifications will be reviewed to verify that all equipment

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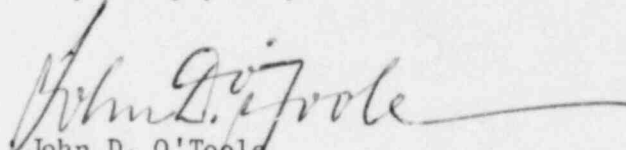
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with limiting conditions for operation have test requirements which provide an adequate assurance of operability. All tests will contain acceptance criteria and additional technical review of test procedures is planned.

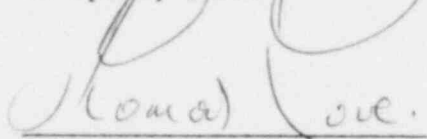
In accordance with 10CFR73.21 of the Commission's Rules of Practice, we request that Attachment B be withheld from public disclosure.

Our response is being provided pursuant to Section 182 of the Atomic Energy Act 1954 as amended. Should you or your staff have any questions, please contact us.

Very truly yours,


John D. O'Toole
Vice President

Subscribed and sworn to
before me the 19 day
of April, 1982.


Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1983

Attachments

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

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Attachment ARESPONSE TO NOTICE OF VIOLATIONAPPENDIX AMARCH 19, 1982VIOLATION A

Technical Specification 3.13.C, Penetration Fire Barriers, requires that the penetration fire barrier between the Primary Auxiliary Building and the electrical tunnel shall be functional at all times. If the requirements of 3.13.C cannot be satisfied within one (1) hour, a continuous fire watch shall be established.

Contrary to the above, on February 22, 1982, the inspector observed two openings in the penetration fire barrier between the Primary Auxiliary Building and the electrical cable tunnel. No fire watch was posted in the area.

This is a Severity Level V Violation (Supplement I).

RESPONSE

Upon notification of the openings in the fire barrier material between the Primary Auxiliary Building and the electrical cable tunnel, a continuous Fire Watch was immediately ordered by the Senior Watch Supervisor. Nuclear Plant Operators were posted on both sides of the fire barriers. Under Maintenance Work Request No. 1437 immediate repairs to the affected fire barriers were started on February 22, 1982 and completed on February 24, 1982. Full compliance with Technical Specification requirements was restored.

To avoid further such violations the process of implementation of modifications involving fire protection is under review to insure provisions are made for timely compensatory action as required.

VIOLATION B

Technical Specification 3.3.D requires that portions of the four weld channel and penetration pressurization system zones be pressurized at or above 47 psig.

Contrary to the above, on February 24, 1982, feedwater penetration "C" and steam penetration "A", portions of the weld channel and penetration pressurization system required to be pressurized, were found isolated and depressurized.

This is a Severity Level V Violation (Supplement I).

Attachment A (Cont'd)RESPONSE

Upon notification of the isolation and depressurization of weld channel penetrations "G" and "A", Nuclear Plant Operators were dispatched by the Senior Watch Supervisor to investigate the problem. Upon completion of the investigation specified pressure was reestablished to zones "G" and "A" and full compliance with Technical Specifications was restored.

To avoid such violations in the future, conventional and nuclear log sheets will be modified to include a requirement to verify proper pressurization on each weld channel rack. Implementation will be completed no later than May 15, 1982.

VIOLATION C

Technical Specifications, Section 3.2, Chemical and Volume Control System, require that two boric acid transfer pumps shall be operable. During power operations, one boric acid transfer pump may be out-of-service, provided the pump is restored to operable status within 48 hours.

Contrary to the above, the licensee's test results obtained in accordance with Procedure PT-M42, Revision 1, Boric Acid Pumps Operational Test and Inspection, on April 17, 1981, June 4, 1981, July 8, 1981, and February 11, 1982, indicate that the pumps failed to meet operability criteria specified in Procedure PT-M42.

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

RESPONSE

Test Procedure PT-M42 was immediately revised on February 11, 1982 after review by the Station Nuclear Safety Committee of a Temporary Procedure Change that included operability criteria and an appropriate method for the determination of operability. This corrective action will avoid further violations of this Technical Specification operability criterion. Subsequent investigation demonstrated that the Boric Acid Transfer Pumps were operable on the above dates and capable of performing their intended safety function.

VIOLATION D

Technical Specification 6.8.1 requires that written procedures be established and implemented. Health Physics Procedure HP 2.1, Radiation Work Permit and Radiation Work Authorization, Revision 4, September 2, 1981, paragraph 8.2, requires that protective clothing specified on any posted entry requirements sign shall be worn.

Attachment A (Cont'd)

Contrary to the above, on February 22, 1982, a fire watch, assigned to the electrical cable tunnel, entered the area without the benefit of the protective clothing described on the HP sign posted at the electrical cable tunnel access point.

This is a Severity Level V Violation (Supplement I).

RESPONSE

The Senior Watch Supervisor immediately replaced improperly clothed personnel in the electrical cable tunnel area with personnel in proper protective clothing. Full compliance with protective clothing requirements was attained at that time.

The Nuclear Plant Operator, who erred in following the protective clothing requirements, did so in order to promptly provide the proper measure of fire protection. The NPO was reinstructed in the the importance of closely observing signs posted in work areas.

In addition, to reduce the likelihood of further such violations in this area, the posting of protective clothing requirements has been changed to encompass a smaller area.