

John D. O'Toole
Vice President

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

July 30, 1982

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

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

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/82-10, conducted by Dr. P. K. Eapen of your office on May 24 through 28, 1982 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your July 2, 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 Notice of Violation enclosed therewith as Appendix A. Our response to the items of non-compliance is presented in Attachment A to this letter.

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

Very truly yours,

John D. O'Toole

Subscribed and sworn to
before me this 30 day
of July, 1982.

Thomas Love

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

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ATTACHMENT A

Response to Notice of Violation

Violation A

10 CFR Part 50 Appendix B, Criterion VI states in part:

"Measures shall be established to control the issuance of documents..., which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy...."

Licensee's procedure OP-290-1 Section 5.2, "Development and Review of Discipline Design Criteria", dated February 11, 1981 states in part:

"The results of the review efforts shall be documented....."

Contrary to the above, as of May 28, 1982 the result of the review efforts for design modification packages MMC 80-2-04 and FFI 82-2-7 (an audit sample) were not documented.

This is a Severity Level V Violation (Supplement I)

Response A

The Con Edison Quality Assurance Program - Corporate Instruction CI-240-1 and Engineering Operations Procedure Manual OP-290-1 satisfy the requirements of Appendix B to 10CFR Part 50. Paragraph 3.3 of Section 5.2 of OP-290-1 stipulates that "The discipline design criteria shall be validated by an engineer other than originator" and that "the results of the review effort shall be documented..." In addition, procedure III of Section 3.0 of the Con Edison Indian Point Quality Assurance Manual stipulates an "independent review of the design documents..." These are mandatory requirements on the part of Con Edison Engineering employees.

In review of the above the lack of documentation for the two cases cited are acknowledged deficiencies. By way of correction, modification file and packages MMC-80-2-04 and FFI-80-2-06 (incorrectly identified as FFI 82-2-7 in the cited violation), were independently reviewed and found to be adequate as of July 22, 1982. Corrective measures taken include re-training of personnel in accordance with Section 5.18 (Engineering Training) of OP-290-1 which began June 28, 1982 in the applicable Engineering organizations.

Violation B

10 CFR Part 50, Appendix B states in part, "Measures shall be established for the identification and control of design interfaces and coordination among participating organizations..."

Contrary to the above, as of May 28, 1982, the design interfaces and coordination were inadequate in that the Engineering organization did not identify and transmit the response time verification requirement of NUREG-0737 for design modification number MMC-80-02-04 "High Range Containment Pressure Indication" to the pre operational test writing group.

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

Response B

The C&I Engineering Modification Procedure (MMC-82-2-04) was developed, approved and issued on September 19, 1980. At that time it was not required to justify a response time for high range containment pressure. NUREG-0737 was issued in October, 1980. However, based on NUREG 0737, post implementation response time calculation and testing is required and an approved final calculation dated May 5, 1982 was issued to the Test and Performance group on July 15, 1982. A pre-operation test to confirm the response time will be conducted during the Fall 1982 re-fueling outage, thus fully complying with requirements.

CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

The personnel involved in the above deficiencies have been instructed (re-trained) to follow the mandatory requirements stated in our Corporate Instruction CI-240-1, Q.A. Program for Operating Nuclear Power Plants and Corporate Engineering Operating Procedure Manual.

As a consequence of the noted deficiencies and the increasing regulatory requirements and complexities, we are reviewing our existing training program to further improve the numerous activities associated with nuclear power plants, such as, document control, design interface, review process, etc.