

John D. O'Toole
Vice President

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

March 9, 1983

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

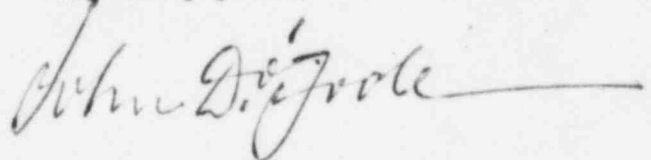
Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

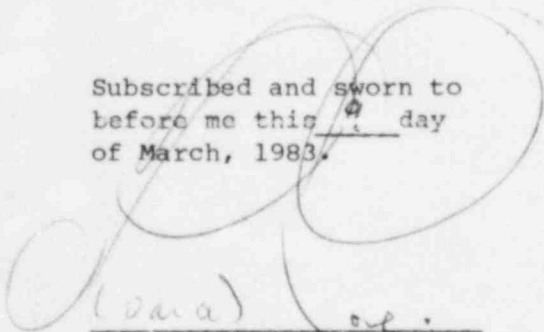
This refers to I.E. Inspection 50-247/83-01 conducted by Messrs T. Foley and P. Koltay of your office on January 1 through 31, 1983 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your February 7, 1983 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to the item 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,



Subscribed and sworn to
before me this 9 day
of March, 1983.



Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2409838
Qualified in New York County
Commission Expires March 30, 1983

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Attachment A
Response to Notice of Violation
Appendix A

VIOLATION

Technical Specification 6.8.1 requires that written procedures and administrative policies shall be established, implemented, and maintained.

Station Administrative Order (SAO) No. 116, "Housekeeping Policy", Revision 1, requires the licensee to establish housekeeping and cleanliness controls for work activities, and conditions and environments that can affect the quality of important parts of the nuclear plant.

Station Administrative Order (SAO) No. 114, "Fire Protection and Prevention," Revision 3, Section II.B.1, requires that accumulations of combustibles which are significant fire hazards be removed after each shift. Section II.B.2 requires the storage of combustible and flammable liquids in approved containers. Attachment 7 to SAO No. 114, requires that within 35 feet of welding and cutting operations, all combustible and flammable material be removed and floor openings shall be covered.

Contrary to the above, a tour of the Primary Auxiliary Building, on January 20, 1983, identified accumulations of combustibles, improper storage of combustible and flammable materials, and evidence of insufficient protection of material and equipment during cutting and welding operations. Housekeeping and cleanliness controls were not established in the area of the component cooling pumps, charging pumps, and 78 foot level mezzanine areas (important parts of the nuclear plant).

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

RESPONSE

All housekeeping deficiencies noted have been corrected. In addition, the storage cabinet for flammable liquid found in the component cooling water heat exchanger area has been properly relocated and secured.

To strengthen compliance with SAO-116 and to prevent the recurrence of housekeeping problems the program of assigning specific housekeeping inspection responsibilities to management employees and upgrading those areas is continuing. These managers are responsible for conducting periodic inspections of their areas to assure that deficiencies found are corrected.

To provide additional assurance that the prevention requirements delineated in SAO No. 114 (Fire Protection & Prevention) are adhered to, it is being revised under the Fire and Property Protection Engineer to further emphasize its intent.

The "Cutting, Welding, Grinding, or Open Flame Permit" (Attachment #1 SAO-114) is being revised and will include a requirement for a daily inspection by the work party supervisor, to assure all applicable precautions listed on the permit are being followed.

In the Planned Revision of SAO-114, the storage of flammable and combustible liquids in any safety related area will not be permitted (except for immediate use). The housekeeping requirements in work areas and the plant in general as set forth by the existing SAO-114 (Fire Protection & Prevention) SAO-116 (Housekeeping Policy) and SAO-105 (Work Permits) will be reemphasized to company and contractor personnel to assure compliance.

The Fire and Property Protection Engineer is responsible for interpretations and is available for advice with regard to combustible control in all areas.