

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 6, 1983

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

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Martin:

This refers to I.E. Inspection 50-247/83-02 conducted by Mr. E.T. Shaub of your office on January 10 through 14, 1983 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your February 4, 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.

In addition, your letter also identifies two unresolved items concerning implementation of the licensed operator requalification program and the associated management control system. Our response to these unresolved items is presented in Attachment B 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 8 day
of March, 1983.

Thomas Love
Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-240953S
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 6.4, "Training" requires the retraining and replacement training program to meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971.

ANSI N18.1-1971, Section 5.5 "Retraining and Replacement Training," requires a training program to be established that maintains the proficiency of the operating organization through periodic exercises, instruction and review. Section 5.5.1, "Retraining," states that retraining should include areas such as emergency plans and security procedures, general safety, and radiation safety.

Contrary to the above, as of January 14, 1983, the licensee's general employee training program did not require periodic retraining for all plant workers in emergency plans, security procedures, general safety, and radiation safety.

This is a Severity Level V violation (Supplement 1).

RESPONSE

Section 5.5 of ANSI N18.1-1971 requires a training program that maintains the proficiency of the operating organization through periodic exercises, instruction and review. This section was interpreted to imply that only operating personnel and not all station personnel were required to receive this training. Operating personnel receive training/retraining in emergency plans, security procedures and general safety as part of the Radiation Protection periodic instruction program. Personnel categorized as operating personnel were intended to be only those who enter radiation areas and therefore fulfilled the intent of Section 5.5 by attending periodic Radiation Protection instruction.

In order to avoid such violations, in the future, the General Employee Training (GET) Program will be expanded and revised to incorporate all station (Nuclear Power) employees into the program.

A new section will be added to the station Training Manual describing the GET programs. The GET program revisions (lesson plans) and the addition of the new section to the station Training Manual will be done by March 7, 1983. The programs will be implemented on March 14, 1983.

ATTACHMENT B
RESPONSE TO UNRESOLVED ITEMS
50-247/83-02-03 and 83-02-04

RESPONSE

All licensed operators completed the reactivity manipulations required by Mr. Denton's letter before January 31, 1983. Schedules have been prepared for completing the remaining simulator training by March 31, 1983.

A summary and completion status form has been prepared and will be utilized to monitor the progression level of each licensed operator through requalification. In the future notification will be made to cognizant management personnel on the status of each licensed operator for each phase (portion) of requalification. This notification will be made if a licensed operator does not attend or fully complete the required phase of requalification.

The 25% grace period has always been intended for limited use where the completion of annual training was unavoidably delayed for exceptional reasons. Future use of the annual tolerance of 25% will be restricted. Only General Managers or their designee(s) may alter schedules, once published. A more intensive use of integrated schedules showing shift operations, training and vacations will be made.