

NOTICE OF VIOLATION

Consolidated Edison Company of New York, Inc.
Indian Point Nuclear Generating Station Unit #2

Docket No. 50-247
License No. DPR-26

During an NRC inspection conducted from March 26, 1995 to May 6, 1995 two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the following violations were identified:

1. Technical Specification section 6.8.1 requires that written procedures are implemented covering activities referenced in Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 requires written procedures for activities related to equipment control (e.g. locking and tagging). Indian Point 2 Station Administrative Order (SAO)-105, "Work Permits" specifies that tagouts are used to direct the manipulation of plant equipment for the express purpose of providing protection to workers, other equipment and plant reliability.

Contrary to the above, on March 9, 1995 while starting the 22 containment spray pump, water was discharged to the pipe penetration area of the PAB. Subsequent investigation revealed that a temporary jumper installed was not addressed in the tagout for work on valve 869A, which had been disassembled for maintenance. Further, on April 8, 1995 during maintenance and subsequent testing of the Condensate Storage Tank, no tagout was used to identify plant conditions which were required for providing protection to plant equipment, such as ensuring an adequate vent path was maintained.

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

2. Station Administrative Order (SAO)-304, "Radiological Boundary Controls," requires that each High Radiation Area (HRA) access point shall be posted with a conspicuous sign bearing the standard radiation symbol and written warning. SAO-304 also specifies that entrance to HRAs and Locked HRAs shall be in accordance with technical specification 6.12. Technical specification section 6.12 requires that each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mr/hr shall be barricaded and conspicuously posted as a high radiation area and entrance into the area shall be controlled by issuance of a radiation work permit. In addition, High Radiation Areas in which the intensity of radiation is greater than 1000 mrem/hr shall have locked doors to prevent unauthorized entry.

Contrary to the above, on April 25, 1995 Con Edison Health Physics (HP) personnel identified a Locked HRA barrier in the Vapor Containment (VC) that had been cut, allowing access to plant personnel. Further, from the period of April 25, 1995 to April 28, 1995 five HRA barriers were found partially blocked open or on the ground, partially obscuring the posting in the Vapor Containment and one HRA boundary posting insert was found missing in the Primary Auxiliary Building (PAB).

This is a severity level IV violation (Supplement 1)

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Pursuant to the provisions of 10 CFR 2.201, Consolidated Edison Company of New York, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA
this 12th day of June, 1995