

John D. O'Toole  
Vice President

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

May 11, 1984

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

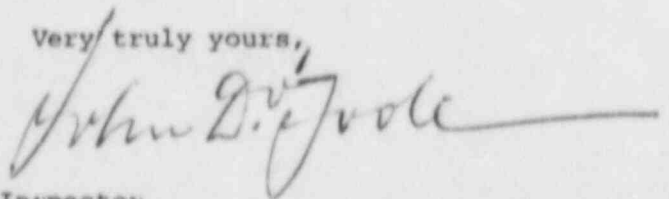
Mr. Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Dear Mr. Martin:

This refers to I.E. Inspection 50-247/84-04 conducted by Mr. D. J. Collins of your office from January 31 through February 3, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your April 11, 1984 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 items of non-compliance is presented in Attachment A to this letter.

Should you or your staff have any questions, please contact us.

Very truly yours,



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

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ATTACHMENT A

Response to Notice of Violation

Appendix A

VIOLATION

10 CFR 20.203(c)(2)(iii) requires, in part, that (1) positive control be provided when access is required to a high radiation area (more than 100 millirem in one hour could be received by a major portion of the body), or (2) the area be locked.

Contrary to the above, at about 3:00 PM, on January 31, 1984, an open equipment hatch access to the Unit 1 vapor container, a high radiation area with up to 2,500 millirem per hour exposure to major portions of the body, was neither under positive control nor locked.

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

RESPONSE

In immediate response to the above violation, the guard assigned to the post in question was recalled to his post and instructed not to leave unless properly relieved or dismissed by the Radiation Protection Supervisor or Nuclear Plant Operator (NPO).

In a review of the circumstances that led to this event we found that the guard used a phone near the post to contact the NPO for relief. The location of the phone did not allow the guard to maintain positive control of the equipment hatch in question.

To prevent such an occurrence in the future, post order guidelines have been revised to require that notifications of this nature be made by radio. In addition, security guards assigned to any high radiation door will receive specific written post instructions from the Radiation Protection Supervisor, approved by the Security Shift Supervisor. This will be accomplished by including them in the appropriate security post order book. This will be implemented by May 14, 1984.