

*Designated Original
Nancy McNamee*

13 JUL 1984

Docket No. 50-247

Consolidated Edison Company of
New York, Inc.
ATTN: Mr. John D. O'Toole
Vice President - Nuclear
Engineering and Quality Assurance
4 Irving Place
New York, New York 10003

Gentlemen:

Subject: Inspection No. 50-247/84-13

This refers to the special inspection conducted by Region I staff members on June 12-15, and July 5-6, 1984 at the Indian Point Nuclear Generating Station, Unit 2, Buchanan, New York of activities authorized by NRC License No. DPR-26 and to the discussions of our findings held with Mr. C. Jackson at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. Jackson and myself on June 19, 1984. This also refers to a June 21, 1984 Confirmatory Action Letter (CAL 84-11) which was sent to you.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. The inspection of your radiological safety program during the current outage at Indian Point Nuclear Generating Station Unit 2 consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector. We also examined the circumstances surrounding the June 19, 1984 unplanned exposure of two workers.

Our review of the circumstances surrounding the June 19, 1984 unplanned exposure of the two workers indicates that inadequate access control to high radiation areas and inadequate communications and instructions to the two workers were the prime causal factors resulting in the unplanned exposures. Although the workers did not receive exposures in excess of regulatory limits, we are concerned that the circumstances surrounding this event created a substantial potential for such exposures. The actual radiation levels in the Regenerative Heat Exchanger Area were high enough so that it is fortuitous that an occupational exposure in excess of NRC regulations did not occur. The apparent violations identified in our review of this event are discussed in the enclosed report. An enforcement conference has been scheduled for July 18, 1984. At this conference, you should be prepared to discuss your review of this event, your corrective actions taken or planned, and your plans for improving the overall quality of your radiation protection program. The need for and nature of appropriate enforcement action relative to the apparent violations discussed will be considered after this conference and will be the subject of separate correspondence at a later time.

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Based on the results of this inspection, it also appears that certain of your activities, not associated with the unplanned personnel exposures discussed above, were not conducted in full compliance with NRC requirements, as set forth in the Notices of Violation, enclosed herewith as Appendix A and B. These violations have been categorized by severity level in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (49 FR 8583) dated March 8, 1984. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A and B.

Sections of the enclosed inspection report contain details of your security program that have been determined to be exempt from public disclosure in accordance with either 10 CFR 73.21 (Safeguards Information) or 10 CFR 9.5.(a)(4) (Commercial or Financial Information). Therefore, the section so identified in the inspection report and Appendix B will not be placed in the NRC Public Document Room and will receive limited distribution. The inspection report cover sheet and any remaining portions of the inspection report will be placed in the Public Document Room, in accordance with 10 CFR 2.790(a), unless you notify, by telephone, the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223, within 10 days of the date of this letter and submit written application to withhold information contained in the report within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1).

The responses directed by this letter and the accompanying Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

ORIGINAL SIGNED BY:

for JAMES M. ALLAN
Thomas T. Martin, Director
Division of Engineering and
Technical Programs

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Violation (Contains Safeguards Information)
3. NRC Region I Inspection Report Number 50-247/84-13 (Section 9 contains Safeguards Information)

13 JUL 1984

cc (w/o Section 9)
C. W. Jackson, Vice President, Nuclear Power
M. Blatt, Director, Regulatory Affairs
W. D. Hamlin, Assistant to Resident Manager (PASNY)
F. Matra, Resident Construction Manager
R. L. Spring, Nuclear Licensing Engineer
Director, Power Division
Thomas J. Farrelly, Esquire
K. Burke, General Manager, Administrative Services
Brent L. Brandenburg, Assistant General Counsel
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