

APPENDIX A  
NOTICE OF VIOLATION

Consolidated Edison Company  
Indian Point Unit 2

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

As a result of the inspection conducted on November 1-30, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583), the following violations were identified:

1. Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33. Section 1.h of Appendix A to Regulatory Guide 1.33 includes procedures addressing log entries, record retention and review. Administrative Directive OAD-3, Revision 6, "Plant Surveillance and Log Keeping" requires specific licensee log keeping technique, and actions to be taken when measured parameters exceed normal or maximum/minimum values. OAD-3 also requires proper administrative review of completed logs.

Contrary to the above, on November, 1984, the inspector identified that measured parameters of control room logs and conventional area logs for the period of October 31 to November 6, 1984 are not being logged in accordance with OAD-3, Revision 6, in three separate areas.

- a. Technical Specification parameters, which had been logged out of normal operating bands were not addressed as required by OAD-3, Revision 6.
- b. Out of specification readings were not circled in red as required, nor were they delineated in the remarks section as required by OAD-3, Revision 6.
- c. Administrative reviews of the logs were inadequate because the reviewers failed to identify the examples delineated in 1 and 2 above.

Collectively, this is a Severity IV Violation. (Supplement 1)

2. 10 CFR 50, Appendix B, VI, "Document Control" states, in part, "Measures shall be established to control the issuance of documents... which prescribe all activities affecting quality."

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Station Administrative Order SAO-120, "Nuclear Plant Operating and Safety Information Handling System," Part "C", Technical Specifications states that, "Reviewers of the amendment changes should assure the status of the plant, drawings and procedures, and training, are consistent with, and comply with amendment requirements in their area of responsibility.

Contrary to the above, the licensee made the necessary changes, for Technical Specification Amendment #74 in the appropriate procedures, but failed to change the status of the plant in that the setpoints of certain 480 volt relays as delineated in the amendment, were not reset to the new value.

This is a Severity IV Violation. (Supplement 1)

3. 10 CFR 50.73 (a) requires a Licensee Event Report be submitted for any event described in the paragraph within 30 days after the discovery of the event.

Contrary to the above, on September 1, 1984, the licensee identified a plant condition that was contrary to prescribed parameters, but failed to report it in the form of Licensee Event Report 84-14 until November 7, 1984.

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

Pursuant to the provisions of 10 CFR 2.201, Consolidated Edison Company of New York, Inc., is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.