

John D. O'Toole
Vice President

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

November 8, 1984

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

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/84-21 conducted by Messrs. T. Kenny and P. Koltay of Your office, on August 1-31, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your September 20, 1984 letter stated that it appeared that certain of our activities were 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 Notice is presented in Attachment A to this letter.

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

Very truly yours,

Richard P. Renshaw

for John D. O'Toole

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

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ATTACHMENT A

INTRODUCTION

Con Edison is evaluating the implementation of its record management program for compliance with applicable regulatory requirements. Concurrent with this evaluation, Con Edison is developing a plan to implement a records management system with centralized controls. Con Edison has reviewed its records management needs in a Nuclear Records Management System study, initiated in 1982. This study addresses management and equipment requirements for system implementation. Some peripheral equipment for the system has already been placed in service. As described in the detailed responses below to the Notice of Violation, the existing records management program procedure is undergoing a compliance review. Document control requirements of the modification process have been strengthened as part of the program to improve the entire modification process. During the refueling, maintenance and ten year inservice inspection outage just concluded, Station Administrative Order 127, "Modification to Indian Point Facilities" was implemented. This procedure established requirements to assure detailed tracking and documentation of modification packages. This will reasonably assure that an accurate record of modifications is created.

To implement a records management system with centralized controls, steps are being prepared for management review to deal with nuclear records and documents. The steps will detail a program which encompasses the dispositioning of records, vital records, standardizing filing and records handling. A schedule for implementing the program should be available in approximately two months.

RESPONSE TO NOTICE OF VIOLATION, APPENDIX A

10 CFR 50.34 requires, in part, that the licensee has a Quality Assurance plan that delineates managerial and administrative controls to be used to assure safe operation in accordance with Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."

Consolidated Edison's Quality Assurance Manual for Operating Nuclear Plants states: "These requirements are consistent with the applicable provisions of 10 CFR 50, Appendix B, Regulatory Guides 1.33 and 1.88 and ASME Code, Section III and that activities of organizations and personnel identified in this procedure shall be consistent with those provisions."

Regulatory Guide 1.88 states, in part, "The requirements and guidelines for collection, storage, and maintenance of nuclear power plant quality assurance records that are included in ANSI N45.2.9-1974 are acceptable to the NRC's staff and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10 CFR Part 50.

VIOLATION A

ANSI N45.2.9.1974 states:

- (1) Each organization responsible for receipt of quality assurance records shall designate a person or agency responsible for receiving the records. The designated authority shall be responsible for organizing and implementing a system of receipt control of quality assurance records."

Contrary to the above, on August 23, 1984, two departments inspected could not produce a system for receipt control of quality assurance records.

- (2) "An audit system shall be established to assure that the quality assurance records storage system is effective."

Contrary to above, on August 23, 1984, the licensee could not provide an audit of quality assurance records.

- (3) "Storage systems shall provide for accurate retrieval of information without undue delay."

Contrary to the above, between the period of August 21-24, 1984, the licensee could not provide an accurate record of design changes requested by the inspector.

- (4) "A list shall be generated designating those personnel who shall have access to the files."

Contrary to the above, two departments could not supply the inspector with a list.

The above collectively are a Severity Level IV Violation (Supplement I).

RESPONSE

Specific responses to the items identified in the above violation are as follows:

- (1) The departments referred to in the violation each have a procedure for receipt control of quality assurance records. An initial review of these procedures, however, indicates that they may not be in complete compliance with quality program requirements.

Station Administrative Order (SAO) 121 "Nuclear Power Station Quality Assurance Record Management Program," states "there shall be record custodian(s) at each record storage location." "Procedures...shall be written for use by records custodians...covering...receipt, indexing, access control, removal and filing". To ensure departments effectively implement program requirements, they have been requested to review their procedures for records custodianship to assure they meet the requirements of SAO

121. The status of compliance with SAO 121 will be evaluated by November 30, 1984. Corrective actions not fully implemented by this date will be completed by January, 1985.

- (2) Quality Assurance audits records management as part of the audits of the functional areas that affect safety. Quality Assurance performs approximately 80 audits per year and these encompass plant operations, radiological and environmental, surveillance testing, training, emergency plan, security plan, fire protection, QA program, administrative controls, corrective action, nuclear fuel and engineering. The results of the records management components of these audits have been reviewed by Quality Assurance and it has been determined that the existing method of auditing quality assurance records reasonably assures compliance with our QA program. As part of its 1984 annual review of the audit program, QA will evaluate consolidating records management in a single audit for the 1985 Audit Program.
- (3) Con Edison has in place a system of storage that provides for accurate retrieval of information without undue delay. In this instance, a modification package (not a design change record) was requested and accurately retrieved without undue delay but found not to include a Post Maintenance Test record. Improvements in documentation reviews implemented since that package was put together are expected to improve the accuracy and completeness of stored information packages.
- (4) In Con Edison's June 10, 1983 NRC approved Quality Assurance Program submittal, we committed to provide lock and key controls and other security measures as a reasonable alternative to access lists where appropriate and that these measures could obviate the need for access lists. The departments referred to in the violation do not require access lists to control access to the files, as lock and key controls are required by procedure. An initial review of these departments practices, however, indicate that they may not be in complete compliance with those procedures. To reasonably assure the requirements of the Quality Assurance Program are complied with this area, procedures covering access control have been included in the review of custodianship discussed above and will be emphasized in audits and/or surveillance of the program.

Quality Assurance Audits and Surveillances will continue to monitor records management requirements.

VIOLATION B

ANSI N45.2.9-1974 requires the lifetime retention of a "Transient or Operational Cycling Record for Those Plant Components That Have Been Designed to Operate Safely for a Limited Number of Transient or Operational Cycles."

Contrary to the above, on August 23, 1984, the licensee could not supply such a record.

This a Severity Level V Violation (Supplement I)

RESPONSE

Nuclear Power has reviewed the requirements for lifetime retention of transient or operational cycling records for plant components designed for a limited number of cycles. Consistent with ANSI N45.2.9-1974, Station Administrative Order 121 requires the maintenance of these records. Among the plant performance and operational records maintained for quality components with transient or operational cycling, the necessary data exists. Con Edison has initiated a review to further define the components having limited transient or operational cycles and will reconstruct a specific set of life cycle records from existing quality documents.