IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-104	Presently, this recommendation is under evaluation. Both Indian Point Units 1 and 2 have a fan induced ventilation system on the roof of the Turbine Building. If the smoke and heat venting capability is found to be inadequate, additional means of accomplishing venting will be installed
A-163	We have, however, ordered a complete set of replacement relays from Westinghouse which are more suitable for the application. Upon receipt of these relays, we plan to install them at the first outage of sufficient duration.
A-185	The vendor's instruction manuals for the above valves do not contain any recommendations for diaphragm service life and/or shelf life. We are in the process of contacting the two valve vendors for recommendations relative to diaphragm service life and shelf life.
A-186	With regards to [NL-76-A65-C02], we expect to receive and evaluate the Vendors recommendations by the end of October, 1976 and will advise you at that time what action, if any, will be considered necessary.
A-248	Design data necessary to properly respond to your request. This compilation of plant data is presently scheduled for completion and transmittal to Con Edison by February 1, 1978. Therefore, it is now anticipated that responses to your question can be provided no later than March 1, 1978.
A-263	We and our NSSS vendor are presently evaluating the reactor cavity annulus seal ring as a potential missile in the event of a postulated loss-of-coolant accident. We expect that the subject evaluation will be completed by March 31, 1978.
A-278	This removal will be accomplished before the startup following the ongoing refueling outage.
A-350	Westinghouse has advised us that their current schedule to provide us with the results of their ECCS reanalysis for Indian Point Unit No. 2 is November 30, 1978. Based on the Westinghouse schedule, with appropriate time for our review, we expect to submit our revised analysis for Indian Point Unit No. 2 by December 31, 1978.
A-405	Con Edison is studying the effect of post incident secondary side pressure reduction to aid in enhancement of primary system subcooling and natural circulation capability. If it is determined to be beneficial, emergency procedures will be instituted to accomplish such a reduction in appropriate situations.
A-411	We have placed an order for NP-1 ASCO solenoid valves and upon receipt we will initiate a maintenance/replacement program as recommended by the manufacturer
A-413	Based on our interpretation of IE Bulletin 79-14, we are also presently conducting a field verification of the as-built configurations of these five (5) additional lines [associated with SG secondary blowdown systems and CVCS auxiliary spray system]. The verification of these five (5) lines will also be completed prior to the end of the current refueling/maintenance outage.
A-416	The procedures will be reviewed to determine if any additional specific directions are required. Any procedural modifications that are deemed necessary will be made by January 1, 1980.
A-422	As soon as the information is available Con Edison will evaluate it. Where such additional instrumentation is deemed necessary, a commitment to install it will be made to the Commission.
A-423	When the results of this generic study are available, we will evaluate their applicability to the Indian Point Unit No. 2 design and provide our final report to the NRC at that time.

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COMMIT #	DESCRIPTION
A-428	By January 1, 1980 Con Edison will: Where possible, measure the actual leakage rates with the systems in operation. All information obtained will be reported to the Commission.
A-429	By January 1, 1980 Con Edison will: Establish and implement a program of preventive maintenance. As required, this program will include periodic integrated leak tests at a frequency not to exceed refueling cycle intervals.
A-430	The first phase, effort on which has already begun, involves the determination of the nature and scope of the problem, if it exists, at Indian Point Unit No. 2. Studies already underway include radiation field level calculations based on the Lessons Learned source term criteria, location of piping capable of containing large radiation sources, identification of adjacent vital equipment and the potential for radiation related dysfunction, and review of present procedures to determine post-accident access requirements. This review will be completed by January 1, 1980.
A-432	A study is currently underway to develop a design to upgrade the automatic initiating signals and circuits of the Auxiliary Feedwater System to full safety grade requirements. We intend to complete any modifications required by January 1, 1981.
A-433	We plan to expand these procedures to include initiating signals and circuits. This program will be developed by January 1, 1980.
A-436	In accordance with the proposed program for implementation of the Lessons Learned Task Force Short Term Recommendations, we expect that the review, procedure preparation, and description of proposed modifications will be completed by January 1, 1980 and any required modification completed by January 1, 1981.
A-444	Analyses related to other transients and accidents contained in Chapter 14 of the Indian Point Unit No. 2 FSAR will be provided by the required date of January 1, 1980.
A-445	This analysis will be submitted by the required date of November 15, 1979, in accordance with the schedule established by the B&O Task Force.
A-449	The existing two water level monitoring systems (containment sump and recirculation sump) will be retained for narrow-range use and to provide redundancy for the new wide range system.
A-450	Con Edison is currently designing a reactor vessel high head point venting system which will be remotely operated from the Central Control Room. The design and supporting analyses will be provided for Commission review by January 1, 1980.
A-472	At present, we do not have detailed information on the test schedule. However, the program is intended to be responsive to the Commission's requirements and we anticipate that it will be available for submission to the Commission by January 1, 1980.
A-473	As soon as the test program has been scoped out, evaluated and approved by the utility members, the schedule will be forwarded to the Commission.
A-476	The design work is scheduled to be completed by November 30, 1979 at which time work on the installation will be started.
A-477	The testing program to qualify the display unit is scheduled to be completed sometime during 1980. As soon as the vendor supplies us with a completion schedule we will forward the information to the Commission
A-483	We will implement any corrective measures deemed necessary by the results of the shielding review for these lines, as soon as possible after any problems have been identified.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-484	The first phase effort involves the determination of the nature and scope of the problems at Indian Point Unit No. 2. Studies already underway include radiation field level calculations based on the Lessons Learned source term criteria, location of piping capable of containing large radiation sources, identification of adjacent vital equipment and the potential for radiation related dysfunction, and review of present procedures to determine post-accident access requirements. This review will be completed by January 1, 1980.
A-485	Second Phase activities will involve the design of corrective measures for any problems found in the first phase effort.
A-486	Phase three involves actual implementation of recommended solutions. The nature and scope of these solutions is presently unknown, but to the fullest extent feasible, implementation will be completed by January 1, 1981.
A-487	As soon as a schedule for plant modifications has been developed, it will be forwarded to the Commission.
A-498	Design details of the existing water level monitoring system will be provided in a supplementary response.
A-499	Con Edison is currently designing a reactor vessel high head point venting system which will be remotely operated from the Central Control Room. The design and supporting analyses will be provided for Commission review by January 1, 1980.
A-502	Installation of the system will be during the next refueling outage which is presently scheduled for December, 1980. Because of outage scheduling requirements, the installation of the venting system may not be completed until sometime in early 1981. However, the work will be completed before the plant is returned to service.
A-503	Specifically, the remaining feedwater system inspections will consist of volumetric examination on each main feedwater line of all pipe girth welds between the steam generator and the first feedwater piping support not inspected during the third refueling outage program. These additional inspections have been scheduled for the unit's next refueling outage (presently estimated to begin December, 1980) and will complete Con Edison's actions in response to IE Bulletin 79-13, as revised.
A-508	This letter documents that with regard to Indian Point Unit No. 2, Con Edison will, by January 1, 1980, either implement the NRC Staff's Category A Lessons Learned requirements as described in our submittals dated October 17, November 20, and December 7, 1979 and as discussed by telephone with the NRC staff, or alternatively, shut down and not restart Indian Point 2 before completion of this implementation.
A-509	Status of this re-evaluation together with our supplemental response to your November 28, 1978 letter and Branch Technical Position CSB 6-4 will be provided to the NRC by March 3, 1980.
A-510	The final results of our electrical re-review will be provided with the containment purging information by March 3, 1980.
A-515	A description of the results of the evaluation will be provided prior to January 1, 1981 and prior to the implementation of any resultant corrective measures.
A-520	The EPRI Program Plan provides for a completion of the essential portions of the test program by July, 1981. Con Edison will be participating in the EPRI program to provide program review and supply plant specific data as required.
A-521	This leak will be repaired during an outage presently scheduled for mid-January, 1980.
A-523	The results of the second phase of the study and implementation schedule for plant modifications will be provided to the Commission by July 1, 1980.

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COMMIT #	DESCRIPTION
A-525	Samples will be analyzed in the existing on-site radiochemical analysis facilities, where gamma spectrum analysis of samples will be performed. Details will be supplied to the Commission for pre implementation review prior to January 1, 1981.
A-526	Analysis related to the definition of inadequate core cooling and guidelines for recognizing the symptoms of inadequate core cooling based on existing plant instrumentation and for restoring core cooling following a small break LOCA were submitted on October 31, 1979. This analysis is a less detailed analysis than was originally proposed, and will be followed up with a more extensive and detailed analysis which will be available during the first quarter of 1980.
A-527	The guidelines and training will be in place by December 31, 1979, as required by the B&O Task Force.
A-528	The results of this study will be provided to the Bulletins and Orders Task Force by March 31, 1980, as required.
A-537	This information, along with data transmission and display modes, will be supplied to the Commission as soon as it is available.
A-541	Summaries of the results of other feedwater systems stress analyses are being developed and, as permitted by Mr. Stello's May 25, 1979 letter, will be provided in a supplemental response on or before July 27, 1979.
A-542	The response to this request will be provided on or before July 27, 1979.
A-543	Since this response is contingent on the response to the previous Staff Request 2, it will also be provided on or before July 27, 1979.
A-544	During the cycle 3/4 refueling outage which began on June 16, 1979, line No. 5 (feedwater line to No. 22 s/g) has been selected for inservice inspection. This inspection will include the following: a.) three circumferential welds including the nozzle to pipe weld. b.) One branch weld. c.) Six pipe supports. d.) Four integrally welded pipe supports. e.) One flange bolting. In addition, special volumetric inspections will be performed during the present refueling outage on the steam generator nozzle to pipe welds for the remaining three (3) feedwater lines.
A-545	Accordingly, as committed to in our July 16, 1979 submittal, we have presently scheduled volumetric examination of the remaining accessible feedwater pipe girth welds inside containment for the fourth refueling outage
A-546	A report summarizing the results of the analysis of delayed Reactor Coolant Pump trip during small loss of coolant accidents for Westinghouse and NSSS will be submitted to Mr. D. F. Ross by Mr. Cordell Reed on August 31, 1979.
A-549	Any necessary procedural and retraining of operators will be completed by December 17, 1979.
A-556	This review will be further addressed as part of our response to Mr. A. Schwencer's October 23, 1979 letter. That response will also include a revised schedule for providing our supplemental response to Mr. Schwencer's November 28, 1978 letter.
A-586	Correct problems associated with the strip chart recorders. Response: Will be done before the unit returns to service.

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COMMIT #	DESCRIPTION
A-592	Provide a lamp test capability for all ESF system and safety significant indicator and status monitoring lamps. Response: We are already committed under the terms of the NRC Confirmatory Order dated February 11, 1980 to complete an engineering study of the entire annunciator system at Indian Point No. 2 by December 1981. This engineering study will identify specific electrical modifications to optimize the "Human Engineering" of the IP2 Central Control Room. We plan to evaluate the advantages and disadvantages of "lamp test" capability modifications as part of this study. Capability for "lamp test" will require replacement of existing indicating lights with physically similar units having "push to test" features and will typically require routing of appropriate neutral or negative wires to the vicinity of the light. In some cases, these wires are available in other Control Room panels; in other cases they must be routed from field equipment. In view of the number of lights involved, our desire to prevent overcrowding of wires in the Control Room panels and existing duplicate indication for specific equipment on different Control Room panels, we request that this action be taken on a schedule compatible with the more rigorous Confirmatory Order Commitment.
A-596	Provide a system to improve communication between operators wearing protective equipment. Response: Our investigation of the availability and proper qualification of protective equipment with built-in communication system is still in progress. We will advise you , in March, 1981, of the status of our investigation.
A-653	The review currently underway is evaluating the distribution of loads on both safety related and non-safety related instrumentation and control buses and existing procedural provisions for handling the loss of such buses as they may affect the ability to achieve and maintain cold shutdown. We presently anticipate submittal of the results of this detailed review, together with a schedule for implementing any necessary changes, by April 7, 1980.
A-655	Our valve qualification program for the containment purge and pressure relief isolation valves is proceeding on an expedited basis. The status of this qualification program together with the status of our evaluation considering the issues contained in Standard Review Plan 6.2.4 Rev 1 and the associated Branch Technical Position CSB 6-4 will be provided by June 2, 1980.
A-667	We will provide a summary of the conditions and results of the [endurance] tests [on all AFW system pumps] by June 16, 1980.
A-672	The design for independent power supplies to the [AFW system] valve position controllers will be provided to the Commission, for their review, prior to January 1, 1981.
A-673	The Auxiliary Feedwater System design basis information requested by the Commission is being prepared by the N.S.S. supplier (Westinghouse). Based on their schedule for completion of the study, it is anticipated that this information will be available for submission to the Commission by August 11, 1980.
A-685	Licensee's training program for reactor operators is to be upgraded to meet the new criteria as specified in the Commission's letter of March 28, 1980. Con Edison Response: We will comply.
A-692	It is presently anticipated that response to the remainder of your information request will be provided by July 15, 1980.
A-693	The status of this qualification program together with the status of our evaluation considering the issues contained in Standard Review Plan 6.2.4 Rev 1 and the associated Branch Technical Position CSB6-4 will be provided by September 2, 1980.
A-702	Measurements will be made after the plant returns to operation and these values will be used to verify our calculations[the calculations referred to in NL-A04-C03].

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COMMIT #	DESCRIPTION
A-724	In view of Supplement No. 3 to I.E. Bulletin 79-01B, dated October 24, 1980, we are including a review of cold shutdown in our environmental qualification review program, and will provide results to the NRC staff by February 1, 1981 as suggested by the Supplement no. 3. In addition, as discussed in Supplement No. 3, we will include in our review equipment which was planned to be installed as a result of lessons learned. Equipment already installed due the TMI Action Plan will have qualification information reported by February 1, 1981. Equipment installed after February 1, 1981 due to the TMI Action Plan will have qualification information reported on a schedule as implemented.
A-737	Prior to using these [NAMCO EA180] switches for any safety related application in >175F environment, we will replace the top cover gaskets with the appropriate replacement gaskets from NAMCO.
A-742	In order to ensure future compliance, we are investigating recorder modifications which would include either an improved inking system or a printing system which does not employ ink. Until these modifications are complete, the existing recorder has been placed on a weekly preventive maintenance program.
A-744	Further discussion is planned to determine the feasibility of such an amendment to the Technical Specifications [that addresses containment spray system operability requirements during containment entries at power].
A-745	Also discussed in our October 31, 1980 letter were the environmental qualification review programs for equipment installed in response to TMI "Lessons Learned" and the TMI Action Plan, as well as equipment required to reach cold shutdown. We currently plan to submit a consolidated report covering each of these issues prior to resumption of power operation.
A-747	Pressure transmitters located in the Safety Injection Room: Further information is being sought from the manufacturer on this item.
A-748	Solenoid Valves, Penetration Areas: In addition to the ASCO Valves discussed in 3.3.2.7-.3.3.2.10 these areas contain Lawrence valves. FRC is still evaluating the analysis of the environment, and we are still pursuing aging data with the manufacturer.
A-749	Large Electric Motors Located in the PAB: A specific determination of qualified life cannot be provided at this time. Thermal and radiation information used in W large motors indicated a life 2 x 10(8) rads gamma and a thermal aging extrapolation to 5 years at 130 C. (Class B insulation limit). However, this does not take into account that the motor operates intermittently and does not run at its limits all the time when it is running. Taking these factors into account, the qualified life should be at least 20 years. However, this statement will require substantiation by determining hot spot temperatures by calculation or direct measurement. A program is underway to determine more exactly the qualified life.
A-750	Pressure Transducer: FRC has requested an analysis of the material used, and a period of qualified life established. This review is being pursued, but the results are not available at this time.
A-751	Hydrogen Recombiner Panel: FRC requested environmental parameters of the new location (or other changes, such as shielding). As of this time the information is not available, but it will be provided as soon as the exact parameters are known.
A-776	Accordingly, any Task Item requiring a January 1, 1981 implementation is planned for completion prior to returning the unit to service and is, therefore, considered to be in compliance with the implementation schedule of Enclosure 1 to NUREG-0737.
A-780	This review and initiation of corrective action for any identified deficiencies is scheduled to be completed by the end of April, 1981
A-781	Reactor Vessel Head Vent System] As required by this Task Item, any additional design details, supporting analyses, plant procedures and proposed technical specifications will be submitted by July 1, 1981.
A-783	Furthermore, as stated in our January 14, 1981 letter, the environmental qualification information on all items planned implementation during the present refueling/maintenance outage will be provided to NRC for review prior to returning the unit to service.

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COMMIT #	DESCRIPTION
A-784	Final design details regarding our implementation of this Task will be available for review prior to returning the unit to service.
A-785	The completion of all modifications will be accomplished by the required implementation date of January 1, 1982.
A-786	Final design details regarding our implementation of this Task will be available for review prior to returning the unit to service from the present refueling/maintenance outage.
A-788	We plan to initiate the training program by April 1, 1981.
A-789	We plan to complete the initial training program by October 1, 198
A-790	It is anticipated that the results of the generic testing will be submitted to the NRC by October 1, 1981.
A-791	Plant specific evaluation submittals will be made January 1, 1982, April 1, 1982 and July 1, 1982, respectively.
A-797	The final design details will be available for review by July 1, 1981 as required.
A-799	The details of our final installation will be provided to NRC for the required post-implementation review prior to returning the unit to service from the present refueling/maintenance outage.
A-803	The Staff will be notified of the results of the evaluation [to determine if incore thermocouples will be utilized in the long-term implementation of ICC capability] as soon as it has been completed.
A-805	Such plant specific procedures [for use of RVLIS in ICC monitoring] will be forwarded to the Staff for review upon completion and will be implemented when NRC Staff approval has been received and the RVLIS is declared fully operational. Based upon presently estimated schedules, the additional submittals discussed above are planned for transmission to the NRC by November, 1981.
A-806	The [WOG] studies are presently planned to be completed and documented to the NRC by January 1, 1982.
A-807	A report describing the results of this [WOG] effort is presently planned to be provided to the NRC by January 1, 1982.
A-808	The Westinghouse Owners' Group, of which Consolidated Edison is a member, is presently planning to provide a report addressing the benchmarking of these codes [LOFTRAN, WFLASH] by January 1, 1982.
A-809	However, due to the time consuming process of data assimilation, synthesis, and evaluation, this [WOG] report is now scheduled for submittal to the NRC by March 1, 1981.
A-810	We propose to let the results of the PRA study identify any component whose past history actually represents a significant adverse contributor to total system reliability. At that time, any necessary [illegible] action will be determined and addressed.
A-811	However, Westinghouse has indicated that they will, nevertheless, address the specific NRC items contained in NUREG-0611 in a model change scheduled for completion by July 1, 1983.
A-812	If the results of this new Westinghouse Model (and subsequent NRC review and approval) indicate that the present small break LOCA analyses for Indian Point Unit No. 2 are not in conformance with 10CFR 50.46, a new analysis utilizing the new and approved Westinghouse Model will be submitted to the NRC in accordance with the NRC schedule.

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COMMIT #	DESCRIPTION
A-814	The Indian Point Unit No. 2 [control room evaluation] is presently scheduled to be completed by February 27, 1981. The results of this study will be used to provide the information required in Attachment 1 to Task III.D.3.4. This information will be submitted to NRC prior to returning the unit to service from the present refueling/maintenance outage.
A-830	As required by item 2 of the bulletin, and as discussed in our June 13, 1980 letter, a test will be conducted to determine that the actual installed instrumentation and controls at Indian Point Unit No. 2 are consistent with the schematics, by initiating a simulated ESF actuation signal and verifying the position of the various pieces of safeguards equipment upon its removal. Performance of this test is planned for the current refueling outage.
A-844	Based on discussions with the staff of the Environmental Qualification Branch and their concurrence, we now plan to submit, prior to January 1982 a consolidated report covering the environmental qualification of all installed TMI related equipment.
A-845	A separate report for cold shutdown equipment will be submitted approximately thirty days after the return of Indian Point Unit No. 2 to service.
A-853	The analysis of the toxic chemical data is ongoing and should any modifications be deemed necessary they will be implemented, as required, by January 1, 1983. Description of any such modifications will be submitted to the NRC following completion of design details.
A-854	The new delivery date for the multi-point recorders is the end of June 1981. They will be installed promptly following receipt.
A-857	Additionally, the Auxiliary Feedwater Pump will be incorporated into our inservice pump test program. (See the Response to Staff Position 8.(j)).
A-861	Proposed technical specifications for the refueling surveillance tests described above are presently planned for submittal to the NRC by August 3, 1981.
A-864	The Westinghouse Owners Group program to be completed in December, 1981, will identify whether future additional plant specific analyses and/or remedial actions may be required, and will identify the time in plant life when these additional actions may be needed. Based on the results of the program, Con Edison will provide additional detail including a schedule for reanalysis and/or remedial action if required, and their bases.
A-866	As part of our review we have identified certain clarifications that should be incorporated in the procedures and these will be included in our 6 month response.
A-867	REGARDING ACTIONS FOR RESTORING OFFSITE AC POWER WHEN ITS LOSS IS DUE TO POSTULATED ONSITE EQUIPMENT FAILURES, Clarifications will be added as necessary to address all systems and equipment available. These clarifications will be incorporated in our 6 month response.
A-868	Some clarifications have been identified and will be incorporated in our 6 month response.
A-874	Inspections would be conducted as per the commitment in the source document (and per the final NRC Phase I SER on the IP-2 submittal in response to NUREC 0612), except that the load cell will not be inspected; also the function of the Load Cell included in use of the Upper Internals Lifiting Rig).
A-875	In addition, please be advised that we have been able to expedite our activities with respect to Item II.F.2 of NUREG-0737 [Instrumentation for Detection of Inadequate Core Cooling] such that our remaining response to this tem (previously planned for November, 1981) will be provided by August 31, 1981.
A-879	In keeping with the intent of this Task Item, proposed final design modifications (if necessary) or additional justification of the acceptability of manual reactor coolant pump trip, will be submitted within three months of receipt of the NRC determination [of model acceptability].
A-894	Consolidated Edison will perform footcandle level measurements of the battery packs and compare lighting levels in front of the Flight and Supervisory Panels against the NUREG 0659/0700 referenced Mil Spec Minimum lighting requirements. This test will be performed at the next outage of sufficient duration.
A-896	Con Edison is a member of the Westinghouse Owner's Group and will modify this 180 day response to include, as appropriate, the results of the Owner's Group Program.

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COMMIT #	DESCRIPTION
A-897	Emergency lighting has been provided in the plant with automatic transfer. This item may receive additional review as appropriate based on the results of the study performed by the Westinghouse Owner's Group.
A-902	Component maintenance and replacement schedules which include consideration of aging characteristics of the installed components will be developed in conjunction with the material evaluations.
A-903	A maintenance program will be established which, in conjunction with the surveillance program and materials study results, will lead to the establishment of a replacement schedule for equipment that is qualified for less than the life of the plant.
A-909	The resolution of the deficiencies associated with these [Westinghouse] terminal blocks is ongoing. Appropriate action will be taken once these deficiencies are resolved. The resilient washers will be installed, and an inspection and evaluation of the necessity for cleaning will be made at the same time.
A-912	Additional studies to document a comparison of the insulation system, lubricants, and bearings to the tested motor is underway and will be forwarded when complete.
A-913	Additional studies to document a comparison of the insulation system, lubricants, and bearings to the tested motor is underway and will be forwarded when complete.
A-914	Appropriate action will be taken once these [cable] deficiencies are resolved.
A-916	The information contained in the above reports demonstrates that the Hydrogen Recombiner can be expected to be available and perform satisfactorily for one year post accident with the possible exception of the Barksdale Flow Switch. Qualification data will be established for this switch or a qualified replacement will be provided.
A-933	Provisions are being made for containing the leakage from the present post-accident noble gas sampling arrangement. A radiation protection review is also being made of the operation of the sampling arrangement during accident conditions.
A-1023	The attachment to this letter describes two Items (II.B.2 and II.F.1) which, in spite of our diligent efforts, will not be completed as previously scheduled. In addition, other systems including the post accident sampling system, Reactor Vessel Instrumentation System (RVLIS) and Separation of Isolation Valve Seal Water System (IVSWS), which have been physically installed, require minor modification and maintenance activities, final calibration and testing which may not be completed as scheduled but which are ongoing and will be completed in the near future. The completion of these activities will be documented in a future letter.
A-1032	An extensive review is being conducted of the Nuclear and Non-Nuclear equipment surveillance and testing programs with the goal of upgrading the Non-Nuclear programs to the same level of attention given safety-related nuclear systems.
A-1039	At the direction of the Chairman of the Nuclear Facilities Safety Committee, the Quality Assurance and Reliability Department is developing a new program to assure that a systematic review for safety implications is conducted of maintenance activities. This program will exceed present regulatory requirements applicable to maintenance and repairs and will be initiated prior to return to service.
A-1056	As a result of that evaluation, we agree to use the criteria listed in your October 9, 1981 Safety Evaluation Report during the current and the following fuel cycle
A-1057	Each of the human factors improvements in the CCR will be implemented by the completion of the Cycle 6/7 refueling outage.
A-1058	Modifications to sixty-five supervisory points will be implemented. This will locate the annunciator point closer to its control/display position.
A-1059	Modifications to accomplish audible alarm localization, increase annunciator flash rates and improve horn silence circuitry will be implemented.
A-1060	Further modifications will be made to eliminate green tiles (normally lit points) to achieve "dark board" normal operation.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-1061	Annunciators and panel device nameplates will be relabeled as required for clarity and consistency.
A-1062	Alarms on some alarm panels will be regrouped to facilitate Operator recognition.
A-1063	Control/Display Separation discrepancies will be corrected.
A-1064	A guard rail will be installed on the Flight Panel to prevent inadvertent operation of the "J" handle control switches.
A-1065	Lamp Test capability will be provided for safety-related indicating lamps having no alternate display.
A-1066	Miscellaneous enhancement improvements as well as hardware modifications will be implemented to correct human engineering deficiencies identified by Gibbs & Hill on equipment installed after the completion of the Essex review.
A-1067	A subset of the control room drawings, selected on the basis of their importance to the safe operation of the plant, will be marked by May 1, 1982 for those systems which are accessible during plant operation and by the end of the next refueling outage for those systems which are not accessible during plant operation.
A-1070	The training program for senior operators is scheduled to commence in April, 1982.
A-1071	We presently anticipate that most, if not all, of the academic training will be concluded before July1, 1982.
A-1085	In response to item A.1 of the enclosure to your letter, we have begun an evaluation to determine the potential for a single active failure in the main feedwater system which could cause the greatest feedwater flow to the affected steam generator during a main steam line break accident. We expect to complete this evaluation by April 1, 1982.
A-1086	After which [C01] a schedule for responding to the remaining issues contained in your January 21, 1982 letter will be provided.
A-1089	In order to meet that date, evaluations have been initiated; however, it may be necessary to continue the evaluation beyond July 1, 1982. If a longer evaluation period is required you will be notified on or before July 1, 1982.
A-1090	Item - II.B.2 Plant Shielding Estimated Date of Completion - Cycle 5/6 Refueling Outage Explanation - Valve 869 B has a bent stem which will be repaired during the next refueling outage; Valve 248 is operational but has to be test stroked. (See Con Edison letter dated February 4, 1982).
A-1099	Be advised that Con Edison, consistent with the schedular requirement of 10 CFR 50.44 (c) (3) (iii), now intends to complete Item II.B.1 during the upcoming Cycle 5/6 refueling outage presently scheduled to commence in September, 1982.
A-1112	Con Edison expects to submit the following plant specific reports by July 1, 1982 and will be in compliance with this item: a) safety and relief valve qualifications; b) piping & support evaluation; and c) block valve qualifications. Should additional time be required to complete the above items we will submit by July 1, 1982 any completed evaluations and appraise you of when the others may be expected.
A-1121	Plant Specific Evaluation of Block Valves: This evaluation is still on-going with a final report scheduled for submittal on or before September 15, 1982.
A-1131	A pre-operational test to confirm the response time will be conducted during the Fall 1982 re-fueling outage, thus fully complying with requirements.
A-1132	The information necessary to respond to the remainder of action item 3a and Action Item 3b of the subject bulletin is currently being compiled and we presently expect to submit it by August 30, 1982.
A-1133	Valve 895 D, Safety Injection 10" check - The carbon steel cover exhibited some corrosion from a previous leak. All the studs were replaced. The removed studs were inspected and had no evidence of corrosion. The cover is scheduled for replacement at the upcoming 1982 Refueling Outage.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-1156	NUREG-0737 Item III.D.3.4 Control Room Habitability: Current Estimated Date of Completion - End of Cycle 5/6 Refueling/Maintenance Outage currently underway.
A-1198	Our best estimate for completion of NUREG-0737 Item II.B.3 is prior to returning the unit to service from the upcoming Fall 1982 refueling/maintenance outage. Accordingly, final design details regarding our implementation of this Task Item will be provided for your post-implementation review by March 1, 1983.
A-1199	We have completed our review of your letter dated November 18, 1982 which requested that a schedule be provided for responding to the Request for Additional Information, enclosed therewith, regarding NUREG-0737 Items II.F.1.4 Containment Pressure Monitor, II.F.1.5 Containment Water Level Monitor, and II.F.1.6 Containment Hydrogen Monitor. We expect to provide the requested information to you on or before May 1, 1983.
A-1200	In response to your August 10, 1982 letter, please be advised that Con Edison will complete the five action items described in Enclosure 4 of that letter during the upcoming refueling/maintenance outage. The commitment to complete these five action items is contingent on the timely delivery of qualified equipment.
A-1201	A complete response to Enclosure 1 of that letter will be provided no later than January 10, 1983. A schedule for the installation of any required plant modification will also be included in this submittal.
A-1208	We will submit, by April 10, 1983, our plans and schedule for qualification or replacement of the equipment in NRC Categories I.B, II. A and II.B.
A-1212	Schedules have been prepared for completing the remaining simulator training by March 31, 1983.
A-1219	It is Con Edison's intention to include subcooling margin information in the SPDS for IP-2. The final design of the SPDS will be addressed in accordance with the guidance of Supplement 1 to NUREG-0737.
A-1222	Any upgrade of the core exit T/C system will be addressed in accordance with the requirements of Supplement 1 to NUREG-0737.
A-1226	The human factors review of operator-display interface will be done in accordance with the guidance of Supplement 1 to NUREG-0737.
A-1230	Technical Specifications for ICC instrumentation, including T/C's, will be addressed in accordance with the guidance of Supplement 1 to NUREG-0737.
A-1231	The requirements of Appendix B will be addressed in accordance with the guidance of Supplement 1 to NUREG-0737.
A-1237	SAS/SPDS terminals will be installed in the Emergency Operations Facility and the Technical Support Center.
A-1265	EOPs will include plant-specific operating instructions for the reactor cooling system vents. This supersedes our response to Request No. 10 in our letter of June 2, 1982.
A-1266	An integrated systems analysis is required to fully address the intent of Regulatory Guide 1.97 and the associated GDCs, and to provide a thorough engineering assessment of the status of IP2. This study, which will incorporate applicable guidance of NUREG-0737, Supplement 1 (concerning data to be submitted for NRC review), has been scheduled for completion in August 1985.
A-1268	The data sets for the TSC and EOF will be coordinated with the Regulatory Guide 1.97 review.
A-1269	Any analysis of documentation research associated with the Regulatory Guide 1.97 effort will be coordinated with ongoing "EQ" (10CFR50.49, 79-01B) programs to ensure that consistent assessment criteria are applied and to avoid possible duplication of analytical effort.
A-1270	The Regulatory Guide 1.97 preliminary evaluation and parameter/instrument tabulations will be evaluated against the SAS/SPDS computer design basis document or detail design package.

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COMMIT #	DESCRIPTION
A-1271	In the event that design changes are necessary, the Regulatory Guide 1.97 conceptual design packages will require human engineering review prior to design finalization.
A-1272	RCP trip resolution and ICC instrumentation will be considered in the R.G. 1.97 review.
A-1273	Where existing plant status monitoring capabilities are found to be deficient, proposed hardware modifications or procedural solutions will be described in the report for the Regulatory Guide 1.97 review. In the event that any hardware modifications are required, conceptual design packages and installation schedules will be developed. This report will be submitted for NRC pre-implementation review and concurrence.
A-1274	The integrated training program will take place in conjunction with the development of the upgraded EOPs. NUREG-0737, Item I.C.1 required integrated training, but no submittal is addressed in Supplement 1 or called out in any clarification that NRC has provided to Supplement 1. The training plan that will be submitted as part of the procedures generation package for the EOPs will cover the following issues: Scope of training, Systematic analysis to determine training objectives, Training design based on objectives, Trainee performance evaluation during training, Training program revision: evaluation of on-the-job performance of trainees following training
A-1275	This response to Generic Letter 82-33 will incorporate any submittals in response to the previously identified requirements.
A-1276	Progress made in developing the responses to the three items mentioned will be integrated into the Supplement 1 NUREG-0737 activities as indicated in the implementation schedule presented in Section 2.0.
A-1278	An analytical effort would be required to resolve this issue. Our current schedule for completion of this study is November 1983.
A-1334	We will issue by December 1, 1983 a second mailing to all approved Class-A vendors who did not respond to the first mailing.
A-1337	A seminar on the subject of "unreviewed safety questions" will be scheduled within one month of the issuance of the guidelines for safety-related reviews.
A-1339	We expect to complete the physical modifications by October, 1984.
A-1353	Generic Letter 83-37 Technical Specification change requested for various NUREG-0737 Items. Response date - January 23, 1984 for RCS Vent System, Item II.B.1 (the remaining Items will be addressed by March 23, 1984).
A-1354	We continue to anticipate, as stated in our April 15, 1983 submittal, that within 120 days following receipt of the WOG report we will complete our assessment of the justification for treatment of manual RCP trip at Indian Point 2.
A-1355	Analyses, testing and/or replacement, associated with equipment the qualification of which has not been demonstrated to date will be completed by March 31, 1985, provided unforeseen circumstances do not arise that would adversely affect this goal.
A-1369	Microswitch Model B2E62RN Limit Switch: An analysis is being performed of the installed units, comparing them to units that have been successfully tested. It is expected that this analysis will demonstrate complete qualification. Completion date prior to 3/31/85.
A-1372	Fisher Controls E/P Transducer: Analyses of aging degradation will be prepared to establish the qualified life of the units based on information contained in the appropriate test reports and manufacturers material lists. Completion date prior to 12/31/83.
A-1373	Con Edison has become aware that some of Limitorque actuators were furnished with motor brakes which may be subject to damage from radiation. The actuators having motor brakes have been identified and the radiation doses to which the actuators will be exposed are being confirmed. Any actuators having motor brakes which could be susceptible to radiation damage will be replaced with qualified SB conversion kits. Completion date prior to 3/31/85.

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COMMIT #	DESCRIPTION
A-1374	Rosemount 1153A Flow Transmitter: After completing the aging analysis, a maintenance/replacement schedule for the degradable components (e.g., the seals) will be established.
A-1376	In the near term, Station Administrative Order (SAO)-114 "Fire Protection and Prevention" is being revised to specify required action for any work on fire barriers. The revisions include a list of fire barriers, notification requirements for breached fire barriers, corrective action and repair and installation procedure guidelines and references. The SAO-114 Revision is scheduled for June 22, 1983."
A-1378	An interim procedure will be issued for the repair of existing fire barriers penetrations in the cable spreading room and control room. The interim procedure will be issued by September 1, 1983.
A-1388	The scope of personnel training will be approximately the same as in the previously submitted program. The system will be declared operational after the training has been completed.
A-1389	We will submit by 10/15/84 a schedule for requalification training in 1985 and 1986 and any request for exemptions to 10 CFR 55 Appendix A that are necessary.
A-1391	We are on schedule with this reassessment and will provide a date to you by July 31, 1984 as noted in that letter.
A-1392	Qualification and training for personnel performing initial post-trip reviews were described in the 11/4/83 submittal. Modification of the licensed operator qualification and requalification training program to require training in post-trip reviews has been completed. Such training was performed in 1983 and will be included in the 1984 qualification and requalification programs.
A-1394	We are currently reviewing the draft NUTAC report. The final NUTAC report is expected to be published shortly. We currently anticipate being able to provide a response to this issue 90 days following receipt of the final NUTAC report.
A-1398	That program [WOG life-cycle testing of shunt and undervoltage trip attachments] is expected to be completed in the second quarter of 1984. Con Edison plans to review the results of that effort and incorporate applicable recommendations.
A-1400	In our 11/4/83 submittal we described the current provisions for independent testing of the undervoltage and shunt trip attachments to the reactor trip breakers. Design testing provisions for the modified design (as described in 4.3 above) will be described in the plant-specific design package to be submitted by 4/84.
A-1401	On the basis of the results of our review and the NRC Safety Evaluation Report (yet to be issued) for the Westinghouse-developed methodology, Con Edison will consider the desirability of proceeding with the plant specific reviews that would be required to support any changes to Technical Specification surveillance intervals.
A-1407	If qualification tests show that any of the added components do not perform their intended function during or after a postulated seismic event, Con Edison will replace these components at the next refueling outage of sufficient duration subsequent to receipt of the replacement components. An auditable link will be established for the components that are not replaced.
A-1408	This equipment will be installed in the Central Control Room where a mild environment exists for all plant conditions. The equipment to be installed meets the criteria for mild environments
A-1409	Each bypass breaker will be tested to determine its operability prior to being placed into service for reactor trip breaker testing.
A-1411	A schedule for submission of any technical Specification changes that may be required will be provided following resolution of the pre-implementation review.
A-1420	We are planning to conduct an exterior surface examination of the [RCP] casing welds, as well as a visual examination for evidence of leakage during the system pressure test [during the 1984 refueling outage]

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COMMIT #	DESCRIPTION
A-1458	We will complete our evaluation of this impact and provide you with the 1986 requalification schedule ten weeks after the completion of the SAS/SPDS and EOPs.
A-1464	Limit Switches for PCV-417, -427, -437, -447, and Fan Coolers 21, 22, 23, 24 and 25 to be replaced with Qualified NAMCO EA-740 limit switches during the 1984 Refueling Outage. Conduit Connections will be sealed
A-1466	Aging evaluations for degradable materials have been completed. Surveillance procedures, maintenance/part replacement/equipment replacement intervals will be determined. The limiting parts in most cases are elastomeric materials. For equipment for which thermal pre-aging was performed as part of the qualification test program (NUREG-0588 Category 1 IEEE-323-74) the test parameters were used to extrapolate the results to Indian Point Unit No.2 conditions using the Arrhenius methodology. For equipment for which no pre-aging was included in the qualification testing, the lifetime of degradable non-metallic materials was determined by the Arrhenius methodology using the activation energy data for the materials involved. In either case, the predicted lifetime will be verified by periodic surveillance and monitoring of the equipment to determine whether degradation which could affect equipment performance (normal and accident) is occurring.
A-1467	Con Edison is aware that qualification testing performed by the manufacturer, NSSS supplier or utility groups may indicate that some maintenance operations may be required at intervals different than are contained in vendor technical manuals. Whenever such data is identified, it will be evaluated and factored into the Indian Point Unit No. 2 program as applicable.
A-1476	The test report [on cables] will be available by the completion of the current 1984 refueling outage.
A-1483	Con Edison is evaluating alternative transmitters to assure that transmitters qualified for the post accident radiation environment will be installed in compliance with the implementation schedule for our NUREG-0737 Supplement 1 Program in accordance with our letter of 7/3/84 regarding inadequate core cooling requirements.
A-1484	The results of the aging analyses will be used in conjunction with failure modes and effects analyses for the safety-related equipment and single failure analyses of the systems in which they are installed to determine whether: 1. Age-related degradation can result in equipment failure or degraded equipment performance. 2. Common mode failure of redundant equipment could occur as a result of age-related degradation.
A-1485	Equipment and/or part replacement schedules will be determined from the analyses so that the equipment is maintained in a qualified state throughout its installed life. (To date, the analyses have not identified any near term replacement requirements).
A-1486	Systematic monitoring and data diagnosis will be employed to evaluate the condition of equipment having non-metallic materials when the degradable property can be determined or directly inferred.
A-1487	The plant preventive maintenance program will be modified, as appropriate, (based on interaction with manufacturers' and/or consultants' updating efforts which incorporate the latest aging information and agreement on revised recommendations of the manufacturers and consultants) to ensure it addresses the specific applications in which the equipment is used.
A-1517	The attachment to this letter provides our response to Items 1 and 6 of the enclosure to your April 24, 1985 letter regarding unresolved questions on TMI Action NUREG-0737 II.D.1 for Indian Point Unit No. 2. With respect to the remaining questions, Items 2, 3, 4, and 5, we are planning to submit the requested information by September 30, 1985.
A-1528	With regard to RVLIS, and as requested in your February 6, 1985 letter, Con Edison will justify including the RVLIS as part of our integrated program to implement the requirements of Supplement 1 to NUREG-0737. This justification will be provided as part of our Regulatory Guide 1.97 analysis and final report to be submitted in September 1985.

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COMMIT #	DESCRIPTION
A-1531	In accordance with the Attachment to your letter of March 11, 1985 we will submit a schedule for the implementation of the modifications identified in Attachment A, Sections 2.0 and 3.0 by December 1985.
A-1576	It is our intention to complete all modifications identified in Attachment A, Sections 2.0 and 3.0, of that letter, by the end of the second refueling outage after the 1986 refueling outage for Indian Point Unit No. 2.
A-1586	Additionally, during the test, certain emergency lighting did not function properly. These emergency lights, shown in Table 3-2, are currently being reviewed as part of routine maintenance activities and will be repaired and re-tested by the end of February 1985. If it is determined that the lighting design is incorrect and additional installation or relocation is required, that work will be completed by June 30 1985 and re-testing will be done subsequent to that installation or relocation work.
A-1598	Lehigh University has been requested to perform scale testing of the Safety Injection pumps to determine the effect that varying blockages in the suction line have upon the pump performance curve. A preliminary report of the testing is estimated to be available by April 30, 1985.
A-1618	Based on our review of the WOG final report, we expect to submit a report responding to item e of the bulletin, including the results of item a, and a description of our program to accomplish the remaining bulletin requirements, by August 15, 1986.
A-1641	A program for selecting correct valve switch settings has been initiated. The program consists of the following: Verify that the delta-p specified for procurement of the valve exceeds the maximum operating delta-p determined in Item a above. Verify with the manufacturer that the switch settings provided by that manufacturer are consistent with the maximum operating delta-p's determined in Item a and/or the delta-p's specified for procurement. (Note that in all instances the delta-p specified for procurement must and does equal or exceed the maximum operating delta-p determined in Item a.
A-1642	A program for selecting correct valve switch settings has been initiated. The program consists of the following: Obtain as-found switch settings.
A-1643	A program for selecting correct valve switch settings has been initiated. The program consists of the following: Adjust as-found switch settings to comply with manufacturer's specified settings, as necessary.
A-1644	A program for selecting correct valve switch settings has been initiated. The program consists of the following: Validate manufacturer's switch settings through actual valve testing against the maximum operating delta-p determined in Item a, where such testing is practical. Where actual valve testing against maximum operating delta-p is impractical, utilize MOVATS (Motor Operated Valve Analysis and Test System) or similar system to determine the actual valve actuator force developed at the attainable (i.e., less than maximum) differential pressure. When MOVATs is used, switch settings will be validated by comparing the thrust developed (at any attainable test delta-p) with validated thrust/delta-p correlations for similar valves obtained from other valves at Indian Point or other facilities.
A-1645	Should the existing settings require change, the valve will undergo a retest by one of the methods described in Item b to verify the adequacy of the new switch settings.
A-1646	The applicable MOV maintenance procedures will be revised to incorporate the manufacturer's specified switch settings by October 15, 1986. Should the program described above require changes to the manufacturer's specified switch settings, applicable procedures will be revised at that time.
A-1648	A written report will be submitted within 60 days of completing the above program.
A-1662	Accordingly, we plan to submit our description of the final design and implementation schedule by January 16, 1987.
A-1709	A study of the battery room HVAC system and the temperature requirements of the safety related equipment located in the area is in progress. This will verify if the system is working as intended and if any modifications to the system is working as intended and if any modifications to the system or revisions to the station Freeze Protection Procedures are necessary to maintain the limiting temperature.

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COMMIT #	DESCRIPTION
A-1710	A review of the Station Test and Performance Battery Procedures to assure the adequacy of these procedures in monitoring the parameters was also initiated.
A-1711	A detailed implementation schedule will be established based on the findings of these studies.
A-1728	This was meant as a reminder that the simulator needed changing and will be part of simulator upgrading.
A-1734	We are expanding our high energy pipe inspection program. In addition to the extraction steam program, the following systems are being added to that program: Condensate; Feedwater; Moisture Separator Drains; Feedwater Heater Drains; Steam Generator Blowdown. Our objective is to develop a 10-year inspection program. Due to the extensive addition of inspection locations, we have elected to rely on the analytical study of these systems to determine the priority for the inspection points to be monitored. The analytical study of using methodologies set forth in EPRI report NP-3944, "Erosion/Corrosion in Nuclear Plant Steam Piping" and EPRI report "Single Phase Erosion/Corrosion of Carbon Steel Piping" has identified 98 areas for actual NDE measurement. In addition, the EPRI CHEC program will be used in supplementing the analytical study where possible.
A-1741	Following this meeting we will determine how to respond to the request for additional information.
A-1751	We plan to incorporate a working level review of all proposed Technical Specifications amendments which may increase the surveillance requirements currently in effect. This review will be completed prior to the submittal of a proposed change in the Technical Specifications and is intended to assure that the proposed surveillance requirement can be meaningfully performed as stated.
A-1754	Review of the NRC's SER and Contractor's TER has commenced. We request an extension to the requested response date in order to ensure that a thorough and careful review of these documents is completed by us and that, if required, changes made to our program documents are done properly. The startup of Unit No. 2 from the present refueling outage also contributes to our need for additional time. It is our intent to respond to your request by February 29, 1988.
A-1777	The importance of the steam generator levels, dryout, and life cycle considerations are to be reviewed with all watch sections. The improper use of EOP's for normal plant evolutions will also be discussed.
A-1779	We note that interim relief has been granted by the NRC until the next refueling outage. We will either install the requisite flow instrumentation on the mini-flow recirculation loops during the next refueling outage or submit further information in support of our relief request sufficiently in advance of the interim relief request approval expiration to allow NRC review.
A-1780	We have implemented a sample disassembly/inspection program for these valves. One valve of this group will be disassembled and inspected each refueling outage until such time that a relief request to change the interval has been submitted to the NRC and approved.
A-1783	Our IST program submittal shall be revised to reflect that we have previously met and currently meet the requirements of Sections XI, Paragraphs IWV-3426 and IWV-3427.
A-1794	Procedural enhancements will remain in effect pending resolution of concerns regarding the potential susceptibility of IP-2's steam generators to high-cycle fatigue tube failure. At such time, we will evaluate the need to continue these procedural enhancements.
A-1803	The EOPs are to be reviewed to identify additional areas where it is necessary to clarify the limits and applicability of the EOP parameters to normal plant evolution. Training programs will incorporate this information. (Scheduled to be completed by March 31, 1989)
A-1821	Training on the use of signature testing equipment for setting switches and maintaining valve operators as well as interpreting signatures will be provided to appropriate individuals prior to the use of this equipment in the 1989 refueling outage. This training will supplement the existing courses on MOV's in the Maintenance Training Program.
A-1822	Plant operating procedures are being reviewed and will be modified as required to make them more complete and correct.

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COMMIT #	DESCRIPTION
A-1823	Additional operator training is being provided to clarify and enhance knowledge of steam generator operation.
A-1824	We will be providing better technical input to and review of operator activities on a real time basis.
A-1828	The EOPs shall be reviewed to identify additional areas where it is necessary to clarify the limits and applicability of the EOP parameters to normal plant evolution. (Scheduled to be completed by March 31, 1989).
A-1830	Quality Assurance will review the report of this investigation of the incident [Jan 1988 Steam Generator dryout], the conclusions of this report, and the corrective Action Plan to assure it addresses the conclusions. Quality Assurance may make recommendations for consideration. (Scheduled to be completed by March 31, 1989).
A-1831	Additional training shall be provided for all control room operators covering Cold Shutdown and Hot Shutdown operations, considerations, and precautions. Scheduled to be completed by March 31, 1989).
A-1833	Present startup procedures shall be reviewed and revised as necessary to incorporate detail of contingency equipment required to be operable if key equipment is not available. (Scheduled to be completed by December 31, 1988).
A-1834	Quality Assurance shall perform a special audit to verify compliance with the Corrective Action Plan; this audit will be conducted after implementation of the long-term corrective actions. (Scheduled to be completed in phases through December 31, 1989).
A-1839	The system description will be revised accordingly. (System description scheduled to be revised by December 31, 1988).
A-1851	The flow rate required for safe extended [AFW] pump operation during this mode is currently being evaluated. We expect to complete this evaluation and provide the results in a supplement to this response by August 31, 1988.
A-1852	Along with the evaluation of the motor driven Auxiliary Feedwater pumps, we expect to complete an evaluation of the Turbine Driven Auxiliary Feedwater Pump No. 22 and provide the results in a supplement to this response by August 31, 1988.
A-1869	These procedure revisions will remain in effect pending resolution of concerns regarding the potential susceptibility of the unit's steam generators to high cycle fatigue tube failure. At such time, we will evaluate the need to continue these procedural enhancements.
A-1885	We will advise you of Worthington's position within 30 days of receipt of their customer advisory letter.
A-1921	Pending the results of this evaluation, the valves identified in the Management Planning Matrix the above Notice of Violation will be tested in accordance with Revision 2 of the IST program summary during the first quarter of 1969, or a Relief Request will be submitted with Revision 2.
A-1922	Revision 2 to the IST program summary will be submitted by January 10, 1989. This revision will also incorporate the available results of the ongoing valve classification evaluation.
A-1923	The evaluation of safety system check valves will be completed by January 31, 1989
A-1924	The evaluation of safety system manual valves will be completed by May 31, 1989.
A-1925	The results will be incorporated into a subsequent revision of the IST program summary
A-1926	In order to assure accurate correlation between the program summary and the corresponding detailed procedures, by January 10, 1989, Revision 2 to our program summary will be incorporated by reference into our quality program procedure TS-SQ-11.017 (TP-SQ-11.017), entitled "Inservice Test Program". This action will place the program summary under full administrative change control.

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COMMIT #	DESCRIPTION
A-1927	In order to obtain more management involvement in the IST program, to improve program definition and implementation, and to encourage periodic re-evaluations of IST classifications of components, we are developing a management planning matrix, which will correlate IST program requirements to the organization responsible for executing each requirement and to the associated implementing procedure for each requirement. This document will be finalized and approved for internal use by January 10, 1989.
A-1928	A review of implementation procedures and functional responsibilities affecting organizations participating in the IST program is scheduled for completion before the end of 1989.
A-1929	Where appropriate, implementing procedures will be modified to assure that program responsibilities outlined in the management planning matrix are fully addressed.
A-1931	Electrical and Mechanical Engineering will resolve the technical issues (i.e., verify switch settings and thermal overloads for the 13 MOVs), which includes providing any justifications or planned fixes required, by February 5, 1988.
A-1933	A written report will be submitted on the completed program in response to Item f of I.E. Bulletin 85-03 by February 26, 1988.
A-1934	In addition to the above schedule, as discussed with Mr. Koshy, Electrical Engineering has committed to verifying the thermal overloads for all safety related MOV's outside the scope of the 13 MOV's identified per the bulletin by April 30, 1988.
A-1935	We have carefully considered the eight expeditious actions to ascertain their applicability to Indian Point Unit No. 2 (IP2) and, as a consequence, appropriate measures will be implemented prior to operation at a reduced inventory condition.
A-1938	The six program enhancements will be addressed within the next 30 days. Our plan will include the impact on our stretch power application submitted 9/30/88.
A-1948	The utilization of hot leg injection for alternate sources of core cooling will be covered in procedures and training.
A-1969	The minimal operable equipment necessary when at mid-loop, together with alternate sources of core cooling (i.e., utilization of Steam Generator) will be evaluated over the specified 18 month period. Our plans with respect to utilization of equipment may change accordingly. Included in this evaluation will be reliability of support equipment.
A-1972	We have already established an analytical basis to ensure adequate RCS venting. Our current plans call for removal of the pressurizer manway. However, due to the substantial ALARA concern represented by this option alternative measures will be evaluated (I.e., steam generator manway). The technical effort, both analytical and otherwise, required to form a basis to support our actions in mid-loop operation is intended to be accomplished no later than eighteen (18) months from the date of receipt of Generic Letter 88-17.
A-1973	We will review the content of the Technical Specifications to determine whether any revisions are necessary. Technical Specification amendments will be sought in those instances which would restrict safe operation at mid-loop with irradiated fuel in the reactor vessel.
A-1974	We will revisit our procedural and administrative controls with the objective of minimizing the loss of decay heat removal capability.
A-1975	Procedures will be reviewed to provide that maximum advantage is taken of this enhanced monitoring capability.
A-1977	The following tasks are scheduled for completion by the end of the next refueling outage for Indian Point 2, currently scheduled to begin 3/18/89: With regard to the stored air in the various accumulators for safety-related components identified in Task 2 above that must perform safety-related functions after an assumed loss of instrument air, the following will be verified: Capability of the stored air to supply the required number of safety-related functions. This verification will be performed in conjunction with CO4 and CO5.

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COMMIT #	DESCRIPTION
A-1978	The following tasks are scheduled for completion by the end of the next refueling outage for Indian Point 2, currently scheduled to begin 3/18/89: With regard to the stored air in the various accumulators for safety-related components identified in Task 2 above that must perform safety-related functions after an assumed loss of instrument air, the following will be verified: Capability of accumulator stored air volumes to perform as designed with assumed leakages for the duration of a loss of instrument air event. This verification will be performed in conjunction with CO4 and CO5.
A-1979	The following tasks are schedule for completion by the end of the next refueling outage for Indian Point 2, currently scheduled to begin 3/18/89: Conducting a test program to demonstrate that the air-operated safety-related components will perform their safety-related function upon an assumed loss of normal instrument air. This test program, in addition to existing surveillance tests that will be completed during March 1989 refueling outage, will demonstrate the following: The safety-related component will fail in the position required to fulfill its safety-related function.
A-1980	The following tasks are schedule for completion by the end of the next refueling outage for Indian Point 2, currently scheduled to begin 3/18/89. Conducting a test program to demonstrate that the air-operated safety-related components will perform their safety-related function upon an assumed loss of normal instrument air. This test program, in addition to existing surveillance tests that will be completed during March 1989 refueling outage, will demonstrate the following: The leakage of check valves which provide isolation between the safety-related supply of air/nitrogen does not exceed the leakage assumed in the design.
A-1983	To assure that the plant safety is not compromised within the requested period of schedule extension, a JCO will be submitted to the staff. The JCO which is currently being developed will be submitted by Con Edison to the staff within 4 months of our receipt of the subject bulletin on January 6, 1989. The JCO will utilize the information, experience, and monitoring data obtained through the WOG program, and will support the alternate schedule discussed herein.
A-1987	In regard to item 7a of the actions requested, Con Edison will continue to procure CBs from CBMs whose programs have been evaluated and approved under the 10 CFR 50, Appendix B program for IP-2. The CBMs are evaluated against criteria based on 10 CFR 50 Appendix B or Regulatory Guides.
A-1988	For CBs purchased as elements of larger assemblies or systems, traceability will be required and will be assured through interim reviews by personnel cognizant of the traceability requirements. These reviews will be formalized as needed.
A-1995	As per our October 18, 1988 submittal, one SMM has been installed per NUREG-0578, Item 2.1.3.b and is operable. A redundant SMM will be installed during the 1990 refueling outage.
A-1999	This inspection frequency will be re-evaluated based on the WOG study results due at the end of 1989.
A-2010	We currently anticipate that the requirements of Item 1.d of Bulletin 88-11 will be addressed by January 1991.
A-2033	We agree that precautionary replacement of these plugs is justified and, consistent with the provisions of the Bulletin (expanded tube less than 3 inches at IP-2), have decided to initiate and complete replacement of the suspect plugs during the next refueling outage in 1991.
A-2044	We are now developing the following specific documentation: Program Document - This document will define the department responsibilities, program goals and an overall plan/schedule for achieving these goals. The scheduled issue date for this document is October 31, 1989. This documentation will be in place prior to our proceeding with the light power and control cable walkdown phase of the program.

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COMMIT #	DESCRIPTION
A-2045	We are now developing the following specific documentation: Interface Procedure - This document will define the inter-organizational process by which field information will be collected, provided for engineering evaluation and reviewed for operability determination and design basis information. The scheduled issue date for this document is November 15, 1989. This documentation will be in place prior to our proceeding with the light power and control cable walkdown phase of the program.
A-2046	We are now developing the following specific documentation: Walkdown Procedure - This document will identify the approach and methodology to be used by personnel in the performance of walkdowns. The scheduled issue date for this document is November 15, 1989. This documentation will be in place prior to our proceeding with the light power and control cable walkdown phase of the program.
A-2054	Henceforth, the importance of the Component Cooling System boundary as an extension of Containment will now also be permanently included in the curriculum of formal instruction received by the Chemistry staff from the Training Department.
A-2058	A further effort to identify and correct similar discrepancies before seasonal related problems occur is underway.
A-2062	It is our current intent to pursue the Westinghouse plug-in-a-plug concept. This would mean the suspect plugs would be left in place but would be isolated from the reactor coolant by means of an inserted plug.
A-2078	It is therefore Con Edison's intention to respond to Generic Letter 88-20 by adopting the probabilistic risk assessment (PRA) approach discussed in that Generic Letter. Given the substantial effort which the IPPSS embodies, it is our further intention to utilize that study to the maximum extent possible in our response.
A-2079	Based on the guidance provided in NUREG-1335, we intend to re-evaluate certain portions of the IPPSS to determine the need to update and enhance the modelling techniques and methodologies used as well as to incorporate changes into the model, where appropriate, to reflect the current plant configuration and operator response procedures. We have identified a number of areas which we consider appropriate for such re-evaluation and would be pleased to discuss them with the staff at any point should you desire. It is our intention to perform the evaluation and any enhancements as a combined effort. We anticipate completion of the technical effort by the end of 1991, and preparation and submittal of our final response by June 1992. Since, as discussed above, we intend to build upon our already completed and documented plant-specific PRA (IPPSS), we anticipate that some deviations from the format presented in NUREG-1335 may be appropriate.
A-2080	Alternative Testing: Testing of these pumps will be performed during refueling shut- downs. This is consistent with present Technical Specification requirements for recirculation pump surveillance testing.
A-2084	As a result of this new criterion, of the 33 safety-related CB spares reported previously, 16 are not considered traceable. These have been placed on material hold until traceability per the new criterion can be established. The 16 CB spares will not be used in safety systems at Indian Point if traceability cannot be obtained.
A-2085	We are continuing efforts to establish traceability of these CBs, especially for the CBs procured directly from a CBM. Any CB whose traceability cannot be obtained will not be used in safety systems at Indian Point.
A-2086	The information generated while performing the actions requested in item I is documented and will be maintained for a period of 5 years, as set forth in item 6 of the actions requested.
A-2087	In regard to item 7 of the actions requested, Con Edison will procure CBs per the requirements stated and as clarified by the supplement.
A-2089	In lieu of this effort we propose to continue with our planned Inservice Inspection effort which requires disassembly and inspection of one check valve each refueling outage. Ultimately all valves will be inspected, and assurance obtained that correct materials are being used without increasing the man-rem exposure associated with a one-time inspection of all valves in addition to our required Inservice Inspection Program.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2091	NRC REQUESTED STATUS OF UNRESOLVED SAFETY ISSUE REQUIREMENTS. This item is incomplete and a response will be provided by March 31, 1990.
A-2092	As required by Generic Letter 89-19, 'Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implication of Control Systems in LWR Nuclear Power Plants" Pursuant to 10 CFR 50.54(f)', issued September 20, 1989, we will respond to the generic letter within 180 days of the date of the letter.
A-2094	A three-year program to review surveillance procedures, which includes I&C procedures, to determine the bases for setpoints has been established. This program is part of the Consolidated Improvement Program and is scheduled to begin January 1990 and to be completed by December 31, 1992.
A-2104	We have recently implemented a maintenance review and procedure upgrade program which includes the CCW Systems. This program should ensure the minimization of human errors in the repair and maintenance of the Service Water and Component Cooling Water Systems.
A-2105	In response to generic Letter 89-13, the training department is presently conducting and documenting a review of the SW and CCW portions of the lesson plans.
A-2107	The identified modifications to the two tests (Procedures PT-V11A, rev. 12 and PT-Q10, Rev 10) were made without the necessary administrative review required by our Temporary Procedure Change practice. These modifications will be incorporated into the procedures by revision process prior to next use.
A-2108	All other surveillance tests are being reviewed and rewritten to include human factor upgrade as part of the biennial review process. This project was started in January 1990 and approximately 100 tests have been upgraded. All tests will be upgraded by 12/92.
A-2111	To provide still additional assurance, we plan the following additional actions: Quality Assurance engineers and Quality Control inspectors will be instructed to verify that work order package involving valve installation include instructions that indicate and ensure proper valve orientation relative to flow direction.
A-2112	We have initiated a comparable evaluation of a second system (Auxiliary Feedwater), and our goal is to complete the evaluation of 19 more systems within the next three years.
A-2113	Acoustic monitoring for check valves 867 A&B and 1838 A&B to be implemented after completion and review of ongoing EPRI studies on acoustic monitoring.
A-2140	The PORVs and block valves at Indian Point Unit No. 2 are currently and will continue to be included within the scope of a program covered by Subsection IWV of Section XI. The PORVs are stroke tested at cold shutdown under this program.
A-2141	A study was recently conducted in accordance with Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs", to determine if additional valves should be included in the Section XI test program. As a result, several valves in the PORV nitrogen control system will be added to the program by 1/91. Two automatically actuated valves in the control system, the solenoids that admit control nitrogen to each PORV, that are subject to a program covered by subsection IWV are considered components of each PORV and are presently cycled when the PORVs are stroke tested.
A-2146	Con Edison, together with the New York Power Authority (NYPA), licensee of Indian Point 3, have initiated a combined IP-2/IP-3 program to complete the plant specific evaluation of the surge line over its design life. We expect this work to be completed in the third quarter of 1991.
A-2147	Indian Point Unit No. 2 will be bounded by the JCO until the plant specific analyses are completed.
A-2186	As explained in our letter of 5/8/91, on this subject, special circumstances precluded repair of one plug of heat 3962 installed in 1/86 in steam generator 24. This repair effort is now scheduled for the next refueling outage in 1993. Secondly, the 37 plugs that were installed in 4/89 in steam generator 22 were not repaired during the 1991 outage: these do not require further effort until the year 2000 due to their reported remaining life.
A-2209	Central Engineering is evaluating various acceptable cable separation barriers alternatives. It is expected that all necessary barrier replacement will be completed by 11/21/91.
A-2210	A technical safety talk has been prepared for presentation to appropriate station personnel. This technical safety talk outlines the potential implications of inadequate cable tray maintenance and re-emphasizes cable tray maintenance practices.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2215	We propose to perform a thorough search for low seismic ruggedness relays which fall under the scope of the IPEEE in conjunction with performance of a full A-46 relay effort,
A-2243	Discrepancies between component function/nomenclature for like performing equipment will be identified through a review of the COLS. This COL review is expected to be completed on safety-related systems (including the EDGs) by 3/1993 and for non-safety-related systems by 8/93.
A-2244	The Operator Training program will highlight the importance of attention to detail regarding EDG valve positioning and adherence to COLS. This is expected to be accomplished by 11/92.
A-2254	We fully expect to submit the final report by 8/29/92, consistent with the time frame established in the generic letter.
A-2276	The enhanced surveillance program document will be revised by 12/93, to reference the monitoring frequencies requested in the bulletin supplement, to incorporate the justification for the RVLIS transmitter monitoring frequency provided herein, and to describe the means by which a high degree of confidence and a high degree of reliability are maintained for the transmitters excluded from the program.
A-2323	The next cycle of a Licensed Operator Requalification will include a discussion by a medical department representative explaining the requirements of a 10 CFR 55.21 & 55.25.
A-2324	Additional confirmatory reviews of the detailed original medical records of affected individuals are currently being conducted by the medical department.
A-2353	Based on your request, we currently plan to commence and complete the WOG current order modification during the Indian Point Unit 2 refueling and maintenance outage now scheduled to begin in February 1997.
A-2355	Between the scheduled 1995 and 1997 refueling and maintenance outages, we will perform on line testing to detect potential corrupted signals and will monitor the progress and experience with the current order modification made at other facilities.
A-2356	Con Edison will continue to review the progress of modification implementation at other facilities to assess whether some other method might be better suited to resolve the issue and avoid any potential detrimental impacts as described above. Should this occur or should our plans for the 1997 outage regarding this matter change from these set forth above, we will promptly notify the NRC staff.
A-2364	The FCU transmitters are currently scheduled for calibration every refueling outage as part of the normal plant surveillance program. The scheduling and performance of refueling outage calibrations will continue.
A-2365	The scheduling and performance of refueling outage calibrations for the containment sump level transmitter will continue.
A-2378	Consolidated Edison commits to using enhanced and improved Eddy Current (ET) inspection techniques as they are developed and verified for use.
A-2379	Consolidated Edison commits to perform post-weld heat treatment of installed laser welded sleeves.
A-2380	Consolidated Edison commits to performing additional confirmatory testing to establish the design life of the sleeves and to confirm that leakage detection requirements will be met. Such testing is underway by Westinghouse in response to similar commitments made for the Commonwealth Edison Plants.
A-2388	A review of qualification and certification documentation for current Con Edison NDE personnel for Levels I, II and III will be accomplished to assure that the condition discussed above is not prevalent. This review will be completed by August 31, 1995.
A-2389	In order to preclude recurrence, the requirement to maintain NDE personnel qualification in accordance with appropriate procedures will be specified in the position guide for the NDE Level III individual responsible for NDE personnel qualifications. This position guide will be revised by 8/31/95.
A-2390	Additionally, by 7/1/95, this notice of violation will be reviewed and discussed with all Indian Point Unit 1 and 2 NDE personnel

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2391	Quality Assurance will perform a surveillance to verify that those procedures and procedural requirements required by Regulatory Guide No. 1.33 (11/72), Appendix A, under item C, Procedures for Startup, Operation, and Shutdown of Safety Related PWR Systems are contained in Indian Point 2 procedures. Any difference will be corrected.
A-2392	Additionally, by 7/1/95 this notice of violation will be reviewed with personnel responsible for the development of operating procedures.
A-2403	The analysts will be qualified to Appendix G requirements of the Guidelines.
A-2404	At least all hot legs and 20% of the tube cold legs will be examined. If cracking indications are found in the cold leg of a tube, the examination will be expanded to include all tubes in the cold leg of that SG. Distorted indication signals may be examined using another advanced type eddy current probe. Tubes cracked in the tubesheet area may be repaired applying the F* criteria or plugged. Any tubes cracked in other areas will be plugged.
A-2407	FULL COMMITMENT CLOSURE dated 8/14/06. The outage scheduling system will be expanded to include activities of important components within the secondary side of the plant with additional detail similar to that currently provided for the primary side components (June 1996).
A-2414	Con Edison plans to review potential available sources of applicable data. Specifically, Con Edison is participating in the Westinghouse Owners Group (WOG) efforts and is monitoring the Combustion Engineering Reactor Vessel Working Group (CERVWG) efforts in the area of data search and retrieval. The NRC has created a data base from individual utilities' submittals. We are reviewing the NRC database to determine whether there is data from other plants applicable to Indian Point 2.
A-2417	In accordance with Generic Letter 93-04, Con Edison will continue to keep NRC informed of its activities in this area.
A-2421	In order to implement this with Indian Point 2 specific equipment, revisions to the Subcriticality status tree and Emergency Operating Procedure FR-S.1 will be implemented. It is expected that these revisions can be made, and personnel trained , within 6 months of receipt of NRC concurrence.
A-2425	Con Edison will comply with all actions and responses specified in the 180-day required response. These include completion and documentation of the following: screening criteria, list of susceptible valves, description of evaluations, susceptibility evaluation results, corrective actions taken or scheduled and justifications for continued operability, as needed.
A-2426	If in preparing the requested 180-day actions any MOV is found to be potentially susceptible, a complete evaluation as described above will be performed.
A-2429	Should additional relevant data be found in the future as a result of on-going industry activities, it will be evaluated, and results provided if necessary, in a subsequent response.
A-2432	We, therefore, intend to modify the double doors to minimize the gap.
A-2434	The tubing will be examined with a technique qualified to detect circumferential cracking.
A-2435	In preparation for the next refueling outage inspection, the Cecco-5 probe will be qualified to accommodate tubes with larger dents.
A-2436	The Cecco-5 probe will be used for the roll transition, top of tubesheet, dented intersections, and u-bends.
A-2437	The full length tube examination sampling size will be based upon Revision 4 of the EPRI PWR Steam Generator Tube Examination Guidelines.
A-2438	In the coming 1997 inspection, we plan to use the Cecco-5 probe to a greater extent.
A-2441	Retrain licensed and non-licensed operators, during Operator Requalification Training, on the IVSW System normal and backup nitrogen supplies, design basis, and system operations. This action is scheduled for completion be 3/31/96.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2446	Review a sampling of Maintenance Rule risk significant systems to determine if isolation or opening of other single (not locked or sealed) valves would place the plant outside of the design basis. This action is scheduled for completion by 6/30/96.
A-2449	A new scenario will be added to the next cycle of operator training which will test the operator's ability to recognize that control rods did not fully insert and to take appropriate action.
A-2450	This bulletin [NRC 96-01] and associated events will be discussed with the operators.
A-2451	If an unscheduled outage of sufficient duration occurs or if an outage is subsequently planned in 1996 Indian Point 2 plans to meet the intent of Requested Actions 3) and 4) from NRC Bulletin 96-01. This will be accomplished by following the actions described in Requested Actions 3) and 4) until such time as Westinghouse and WOG have identified the appropriate data required to support a root cause determination.
A-2452	Indian Point 2 will provide an update of our Bulletin 96-01 response if our plans for implementing Requested Actions #3 and 4) are modified to support the collection of appropriate data for the root cause determination.
A-2453	In the event of an unanticipated reactor trip we will evaluate the operability of the control rods and report our findings to the NRC and per the Bulletin.
A-2461	Electrical schematic drawings and plant surveillance test procedures that include the reactor protection actuation system, emergency diesel load shedding and sequencing (including undervoltage and degraded voltage logic), and actuation logic for the engineered safety features systems will be identified. The methodology for this action will include a line by line comparison of each identified test procedure against associated schematic drawings. A written report describing any segments of logic circuitry not adequately covered by tests will be developed. This report will be reviewed for compliance with the Technical Specifications. Any proposed test procedure changes or plant modifications will be identified. This review will be completed by 11/1/96.
A-2462	Any proposed test procedure change or plant modification which results from this review, depending on the scope involved, would be targeted for implementation prior to startup from our 1997 refueling outage which is presently scheduled to commence on April 4, 1997. A letter forwarding specific details of this implementation will be issued after 11/1/96.
A-2466	A modification for the replacement of embedded concrete anchors will be developed and implemented for any embedded concrete anchor which is identified by the inspection, as needing replacement.
A-2469	This event will be included in industry events training for the project managers designated for the next refueling outage.
A-2480	Training for all operations personnel on this event will be conducted by October 1996.
A-2481	Because a supervisor was involved in this event, the plant manager or VP Nuclear Power will meet with all work supervisors to emphasize conservative decision making, procedural compliance and accountability. These meetings will be completed by September 1996.
A-2501	Further analysis will be performed to determine susceptibility to water hammer and/or two-phase flow in other portions of the system.
A-2502	Con Edison will also determine, as requested by Action 2, whether piping systems that penetrate containment are susceptible to over pressurization as a result of the thermal expansion of fluid within the piping.
A-2505	During the spring 1997 refueling outage, system walkdowns will be performed to identify any leaks inside containment. Rectification at that time is intended to ensure similar situations will not occur.
A-2513	It is our intention to affect an appropriate repair during the 1997 refueling outage, which is currently scheduled to begin in April 1997.
A-2572	Additional training on the significance of this event with an emphasis on good communication skills and teamwork will be given to appropriate station personnel by October 31, 1997.
A-2599	The corrective action for this situation is to review the event with Operations personnel during operator requalification training to emphasize the need for procedure adherence and good communications. This is scheduled to be completed by October 31, 1997.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2611	A valve factor basis document is being prepared to document the source of all applied valve factors for Con Edison gate and globe valves not evaluated with EPRI PPM. In addition, an available valve factor calculation and a thrust margin calculation are being prepared. These documents are scheduled to be completed by October 1997.
A-2618	Valve 885A will be opened during the 1999 refueling outage to confirm the presence of a disc pressure equalization hole, if no hole exists a hole will be drilled at that time. In the interim, operating procedures have been revised to eliminate the source of and potential susceptibility to pressure induced pressure locking associated with this valve. A description of these administrative controls is provided in Section 6.6, of Calculation No. MEX-0031-02.
A-2619	Valves 888A and B are considered susceptible to pressure locking. Administrative measures have been incorporated to eliminate the source of pressure induced pressure locking for these valves. A description of these controls is contained in section 6.7 of Calculation No. MEX-00131-02.
A-2632	The establishment of a "hard logic" for OPS operability as a prerequisite to vacuum refill for future outages will be completed by April 30, 1998.
A-2638	Evaluate a design modification for the addition of primary indication of main boiler feed pump trip status generated from the BFD-2-21 and BFD-2-22 valves. This corrective action will be completed prior to the 1999 refueling outage.
A-2639	Determine the appropriate administrative controls for safety-related motor-operated valve rotor setpoints. This corrective action will be completed prior to the 1999 refueling outage.
A-2641	Develop and implement a plan/matrix ensuring that acceptable levels of key plant personnel are consistently maintained. This corrective action will be completed by December 31, 1997.
A-2644	To prevent a repetition of this type of event, Con Edison will perform a re-evaluation of the IST program selection criteria document and review the need to revise the IST program scope. This corrective action will be completed prior to the 1999 refueling outage.
A-2669	The following items will be implemented prior to returning the plant to service: Operations Department error reduction training and reinforcement of the standards for use of error reduction tools.
A-2670	The following items will be implemented prior to returning the plant to service: Operations Department standards for strict procedure adherence reviewed, enhanced, and reinforced.
A-2672	The following items will be implemented prior to returning the plant to service: This response will be required reading for Operations personnel.
A-2680	A field wiring check of all EDG panels is in progress and is scheduled for completion by May 10, 1998.
A-2684	Con Edison will revise, as required, and resubmit the IST program document identifying components added or deleted from the program as a result of the review, and will include relief requests and cold shutdown/refueling justifications.
A-2825	This incident is being scheduled to be presented as a Lessons Learned example in the continuing training program for electrical construction workers at the IP2 station.
A-2826	A review of electrical drawings will be performed to determine the appropriate method of display related to the designation of internal versus external wiring termination points. The review is scheduled for completion on or before October 30, 1998.
A-2834	Proposed corrective actions include the following items: 3. Communicate the changes to all Operations personnel. Implementation of these items is scheduled for completion on or before September 30, 1998.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-2835	The following corrective actions are being implemented: The event will be reviewed in continuing training for ESP and Maintenance personnel (Scheduled for completion on or before December 31, 1998).
A-2836	The following corrective actions are being implemented: QC personnel will be included in selected maintenance and ESP training. (Scheduled for completion on or before December 31, 1998).
A-2838	The following corrective actions are being implemented: Train QC personnel including contract support. (Scheduled for completion on or before July 30, 1998).
A-2839	The following corrective actions are being implemented: Review other procedures that use hydraulic torquing tools, e.g. SI pumps, main turbine, heater drains, etc., and evaluate changing the procedures to specify the type of head and pressure to be used. (Scheduled for completion on or before September 30, 1998).
A-2841	The startup authorization will be completed in accordance with SAO-405 and SE-Q-12.207 upon successful completion of the two safety related PMTs. This will be done prior to Plant startup and prior to any use of the level transmitter in the "in line" configuration.
A-2889	Con Edison is further evaluating the guidance provided in EPRI TR-109937, "Guideline on Nuclear Safety-Related Coating." Upon completion of this evaluation, improvements to our overall protective coating program will be instituted if necessary. We estimate completion of this evaluation by November 1, 1999.
A-2892	Commitment: 21 FCU - replace bottom three (3) rows of HEPA filters. Due Date: 12/31/98.
A-2893	Commitment: 24 FCU - replace bottom three (3) rows of HEPA filters. Due Date: 12/31/98.
A-2895	The refueling surveillance test containing the visual filter inspection will be enhanced to include lessons learned from this event. Due Date: 12/31/98.
A-2896	Commitment: 21 FCU - replace all HEPA filters. Due Date: RFO 2000 as currently scheduled.
A-2897	Commitment: 24 FCU - replace all HEPA filters. Due Date: RFO 2000 as currently scheduled.
A-2898	Commitment: 23 FCU - replace all HEPA filters. Due Date: RFO 2002 as currently scheduled.
A-2899	Commitment: 22 FCU - replace all HEPA filters. Due Date: RFO 2004 as currently scheduled.
A-2900	Commitment: 25 FCU - replace all HEPA filters. Due Date: RFO 2004 as currently scheduled.
A-2935	Prepare checklist for all existing PPM calculations. (due 7/31/99).
A-2936	Evaluate modification options for low margin valves and establish a definitive program consistent with margin improvement goals. (evaluation program & mods to be completed by RFO2000).
A-2938	Inform NRC when Limitorque configuration review is complete. (due 30 days from receipt).
A-2959	Provide copies of the calculations of radiological doses.
A-2964	All of the above Specifications {SEE BELOW} and associated bases will be transferred as written to the UFSAR. Any subsequent changes to the above provisions will be controlled in accordance with 10CFR50.59 and 10CFR50.71(e). 1) T.S. 3.3H.3: delete this section in its entirety 2) T.S. 3.3. Basis pages 3.3-15 and 3.3-16: delete the description of the toxic gas monitoring system beginning with the last paragraph on page 3.3-15 "The control room ventilation system is equipped with a toxic gas " through the second paragraph on page 3.3-16 "Study dated June 10, 1991." 3) T.S 4.5.E.7: Delete this section in its entirety.
A-3016	Con Edison plans to revise the year 2000 IP2 Business Plan to resolve the specific NRC issues raised in the inspection report.
A-3122	CONDUCT A REVIEW OF ENCHANCEMENTS AND IMPROVEMENTS IN THE REMEDIATION POLICIES AND PROCEDURES. REVISE PROCEDURES TO INCORPORATE "BEST OF BEST" PROCESSES.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-3123	OPERATIONS TRAINING WILL DEVELOP AND SCHEDULE HIGH INTENSITY LOR TRAINING TO IMPROVE OPERATOR UNDERSTANDING OF EMERGENCY OPERATING PROCEDURES ("EOP"), INCLUDING EOP BASES, AND ABNORMAL OPERATION INSTRUCTIONS. THIS TRAINING WILL OCCUR OVER A 4 WEEK PERIOD FOR EACH CREW AND ADDRESS PROCEDURE USE AND ADHERENCE, UNDERSTANDING PLANT AND SYSTEM RESPONSE, DIAGNOSIS OF EVENTS, CONTROL BOARD OPERATIONS, AND REACTIVITY MANAGEMENT.
A-3124	AN OPERATIONS TRAINING SUCCESSION PLAN WILL BE IMPLEMENTED TO ENSURE THAT TALENT AND EXPERTISE ARE MAINTAINED WITHIN THE ORGANIZATION.
A-3130	THE CONTAINMENT INTEGRATED LEAKAGE TEST PROCEDURE WILL BE REVISED TO ENSURE THE ABANDONED PORTIONS OF THE WELD CHANNEL[S] AND PENETRATION PRESSURIZATION SYSTEM ARE SUBJECTED TO CONTAINMENT ATMONSPHERIC PRESSURE DURING THE PERFORMANCE OF THE TEST.
A-3139	Complete the corrective actions necessary to return fire barriers to service for those discrepancies identified during extent of condition. Due date no later than December 21, 2002
A-3167	INCREASE STEAM JET AIR EJECTOR SAMPLING TO TWICE A WEEK WHILE THE PLANT IS OPERATING, FOR THE BALANCE OF CYCLE 17, BEGINNING 40 CALENDAR MONTHS AFTER COMPLETION OF THE LAST STEAM GENERATOR C-1 INSPECTION. DUE DATE INDICATED AS "BEGINNING MARCH 17, 2006, UNTIL JUNE 17, 2006"
A-3170	ONE-TIME COMMITMENT: EVALUATE FOR FUTURE STABILIZATION THE ELEVEN TUBES THAT DID NOT EXHIBIT WEAR AT ALL FOUR AVB INTERSECTIONS. DUE DATE IS INDICATED AS "WITHIN 90 AFTER THE COMPLETION OF THE NEXT SCHEDULED STEAM GENERATOR INSPECTION.
A-3181	ENTERGY HAS VERIFIED THAT A HYDROGEN MONITORING SYSTEM CAPABLE OF DIAGNOSING BEYOND DESIGN-BASIS ACCIDENTS IS INSTALLED AT IP2 AND IP3 AND IS MAKING A REGULATORY COMMITMENT TO MAINTAIN THAT CAPABILITY FOR BOTH UNITS. THE HYDROGEN MONITORS WILL BE INCLUDED IN A PREVENTIVE MAINTENANCE PROGRAM TO ASSURE THAT THE MONITORS ARE MAINTAINED RELIABLE AND FUNCTIONAL.
A-3183	ENTERGY IS MAKING A REGULATORY COMMITMENT TO PROVIDE OCCUPATIONAL EXPOSURE INFORMATION TO THE NRC ANNUALLY, IN ACCORDANCE WITH 10 CFR 20.2206, TO SUPPORT THE APPORTIONMENT OF STATION DOSES TO DIFFERENTIATE BETWEEN THE OPERATING AND SHUTDOWN UNITS. THE DATA WILL PROVIDE THE SUMMARY DISTRIBUTION OF ANNUAL WHOLE BODY DOSES AS PRESENTED IN APPENDIX B OF NUREG-0713 FOR OPERATING AND SHUTDOWN UNITS. THIS COMMITMENT TO PROVIDE OCCUPATIONAL EXPOSURE INFORMATION WILL BE INCLUDED IN THE TECHNICAL REQUIREMENTS MANUALS FOR IP2 AND IP3. DUE DATE IS 30 DAYS FOLLOWING NRC APPROVAL OF THE LICENSE AMENDMENT REQUEST.
A-3190	COMPLETE THE ANALYSIS OF THE SUSCEPTIBILTY OF THE ECCS AND CSS RECIRCULATION FUNCTIONS FOR INDIAN POINT UNIT 2 TO THE ADVERSE EFFECTS OF POST ACCIDENT DEBRIS BLOCKAGE AND OPERATION WITH DEBRIS-LADEN FLUIDS IDENTIFIED IN GENERIC LETTER 2004-02.
A-3194	Entergy recognizes that the NRC staff has not yet made a final determination on the acceptability of MRP-55. Should the staff determine the crack growth formula used by Entergy is unacceptable, Entergy will revise the analysis that justifies relaxation of the First Revised Order within 30 days after the NRC advises Entergy of an NRC approved crack growth formula. If the revised analysis shows that the crack growth acceptance criteria are exceeded prior to the end of the then current operating cycle, this relaxation will be considered rescinded and written justification for continued operation shall be submitted to the NRC within 72 hours. If the revised analysis shows that the crack growth acceptance criteria are exceeded during the subsequent operating cycle, Entergy will submit the revised analysis for NRC review within 30 days. If the revised analysis shows that the crack growth acceptance criteria are not exceeded during the current operating cycle or the next operating cycle, Entergy shall confirm that the analysis was performed in a letter to the NRC within 30 days. Any analysis was performed in a letter to the NRC within 30 days. Any crack growth analyses performed for RPV head inspections after the NRC advises Entergy of an NRC approved crack growth formula shall use that formula
A-3209	ENO WILL ADMINISTRATIVELY MAINTAIN THE INDIAN POINT UNIT 2 TS PRIMARY-TO-SECONDARY LEAKAGE LIMIT AT 75 GPD THROUGH ANY ONE STEAM GENERATOR.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-3254	With regard to environmental testing of ESF components, Con Ed stated the following: c. The Class B operators of motor-operated valves that are required to be operable during the recirculation phase will be replaced with Class H operators. Valves required to be operable only during the injection phase will retain the Class B operators.
A-3255	With regard to environmental testing of ESF components, Con Ed stated the following: e. FSAR pages Q 7.8-1 and 6.2-35 state different test conditions. The inconsistency will be resolved by an amendment.
A-3259	Safety Injection System - Site Inspection The licensee was informed that the welding of the safety injection system appeared to be of good quality. The existence of undesirable surface conditions (weld spatter, arc strikes, gouges, excessive grinding and questionable fitup) was emphasized Con Ed and Westinghouse indicated that a final surface inspection of each system will be performed prior to system hydrostatic testing. At that time final cleanup and acceptance of the surface conditions will be made.
A-3299	Westinghouse has provided us with sufficient W-2 switch modification kits each of which has been examined and certified by WEDCO Quality Assurance. In addition, our own station Quality Assurance personnel will inspect, on a sampling basis, the modification kits prior to installation.
A-3304	We are currently in the process of determining whether similar circumstances exist at Indian Point Unit No. 2 and will advise you of our findings by December 15, 1974.
A-3305	Within thirty (30) days of completion of the above inspection, the specific findings together with a description of any corrective action found necessary, including the scheduled completion date of any planned corrective action, will be submitted to your office.
A-3324	To provide assurance of the integrity of the containment spray piping which is not normally pressurized, a representative sample of welds in this piping will be volumetrically examined. These examinations will be performed in Unit No. 2 during the outage now scheduled for April 1977, and in Unit No. 3 at the earliest outage of sufficient duration.
A-3325	Examinations will be in accordance with the rules for Class 2 components in the ASME Section XI Code to the extent practical. The program will require volumetric and/or hydrostatic examination of approximately one third of the total number of welds and one third of the total number of piping systems in the group within each 40-month inspection period.
A-3327	Inspections of Unit No. 2 for the next period will take place during the next refueling outage, scheduled for the Spring of 1978. A representative number of stainless steel piping systems that could contain non-flowing boric acid solution will be selected for examination as part of the groups included in the next inspection period.
A-3336	Hydrogen trailers containing hydrogen cylinders will be relocated to a minimum of 50 feet from any building containing safe shutdown equipment. Applicable Appendix A to BTP 9.5-1, Section B.2. NRC Safety Evaluation Report (SER) dated January 31, 1979 Applicable IP2 Submittals: Review of Indian Point Fire Protection Program, dated April 15, 1977.
A-3380	We have initiated a study to determine the repeat accuracy range of all pneumatic time delay relays installed in safety related systems. If the repeat accuracy range of any of these relays is found to be +/- 15 percent or greater our study will include our basis for determining that these relays provide satisfactory operation. It is anticipated that this study which will include a complete evaluation of the time delay relays will be completed within the next 6 months.
A-3430	We have made arrangements to obtain the additional information requested by the bulletins from our NSSS supplier; however, as of this date the information is not yet available. We expect that this information will be compiled over the next several months and will advise our NRC Project Manager regarding the method of and schedule for submittal as soon as they have been firmly established.
A-3431	As noted below certain stem-mounted limit switches have been identified for replacement and their environmental qualification and installation will be monitored, together with any new items of concern, by Con Edison's ongoing Environmental Qualification review program.
A-3432	These stem-mounted limit switches are on order and are scheduled for installation during the refueling outage expected to commence at the end of this week.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-3433	A finite element model of the anchor bolt, base plate, and concrete sub-grade assembly has been developed to compute the new bolt design loads utilizing the non-linear capabilities of computer code ANSYS. The model includes the effects of base plate flexibility, bolt stiffness, concrete stiffness, bolt spacing, edge distance and stiffening attachments as required by the bulletin. A detailed description of the analytical model will be provided to the Regulatory Staff along with a complete report of the Generic program on its completion.
A-3434	Teledyne has indicated that the generic program is progressing as planned and all the shear-tension interaction and cyclic load tests are schedule to be completed by July 15. The results of the generic program shall be submitted to the Regulatory Staff within 10 days after receipt from Teledyne.
A-3435	Any visual inspection or tension test failure found will be corrected such that all installations will be correct installations and all seismic Category 1 supports will be capable of carrying the required loads.
A-3437	. . . the performance of a visual inspection of feedwater system piping supports and snubbers inside containment, as requested by items 1.c and 2.c of the Bulletin [79-13], is essentially completed and operability and conformance to design has been confirmed for the areas inspected. Inspection of the few remaining areas will be completed prior to the end of the present refueling/maintenance outage.
A-3440	Indian Point 2 is presently in a refueling/maintenance outage. All of the actions requested will be implemented prior to returning the unit to service.
A-3445	In the future, results of visual inspections [of piping] performed monthly or during cold shutdowns will be documented and be available at the site for your inspector's review. The results of the visual inspections will be reported in accordance with item 4 of the bulletin only when leak indications are identified. All other inspections will continue to be reported as required in the bulletin [IE Bulletin 79-17 Rev. 1].
A-3451	A review of the drawings (at the schematic level) has been initiated to determine whether or not upon the reset of an ESF actuation signal, all associated safety-related equipment remains in its emergency mode. This review is continuing, and its completion is currently anticipated by September 15, 1980. A supplemental report of the results will be forwarded upon completion.
A-3452	As required by item 2 of the subject bulletin, a test will be conducted to determine that the actual installed instrumentation and controls at Indian Point Unit No. 2 are consistent with the schematics reviewed in item 1 by initiating a simulated ESF actuation signal and verifying the position of the various pieces of safeguards equipment upon its removal. Performance of such a test cannot be accomplished during normal reactor operation. Accordingly, performance of the testing required is planned for the unit's next refueling outage which is currently scheduled for December 1980.
A-3457	Based on current delivery time estimated for motor control centers, transformers and control panels it is expected that the final connection of the electrical supply to all equipment can be accomplished during the first scheduled outage, of sufficient duration, following completion of the refueling outage. Any changes to this schedule will be reported to the Commission as soon as possible.
A-3506	Additionally, in conjunction with the original implementation schedule for Item II.B.3 (i.e., prior to returning the unit to service from the Fall 1982, refueling/maintenance outage) we had planned to provide final design details for your post-implementation review of the Post-Accident Sampling System (PASS) by March 1, 1983. Consistent with this basis and in view of the above completion date for Item II.B.3 we now plan to submit by June 1, 1983 the pertinent information necessary to complete your post-implementation review.
A-3508	Some of the guidance items addressed in Attachment A require longer term evaluations that can only be properly done in conjunction with other activities being carried out in connection with Supplement 1 to NUREG-0737. As discussed in the NRC Workshop meeting held on February 22, 1983, the Supplement 1 schedule should reflect other issues that have an impact on one or more of the individual initiatives. The broad distillation of NRC-issued guidance reflected in Supplement 1 to NUREG-0737 includes the Inadequate Core Cooling Instrumentation requirements. For this reason our integrated program plan to be submitted on April 15, 1983 will factor in the items requiring longer term evaluations as pointed out in Attachment.
A-3511	Final Resolutions: Qualification testing of the Harbor Industries cable which will envelope the Indian Point Unit No. 2 accident and post-accident conditions will be conducted to establish qualification. Testing will be completed prior to March 31, 1985.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-3513	Final Resolution: The plant maintenance procedures for the RHR pump motors will be evaluated against current Manufacturer's recommendations and revised (if required) prior to March 31, 1985.
A-3516	Drawings are being issued as corrections indicated by the walkdowns are resolved. Issuance of these drawings is expected to be completed during December 1983. Verification of Control Room drawings in areas that remain inaccessible is scheduled for completion by the end of the next refueling outage.
A-3524	If this, or any other additional material physically handled by Pay Miller, Inc. is identified as installed in safety related systems of Indian Point Unit No. 2, a supplemental report will be submitted.
A-3525	Since the installation of this material in the 1978/1979 refueling outage, these reducers have been subjected to numerous primary system hydrostatic tests and have been continuously subjected to pressurizer operating conditions without any indication of degradation. Nevertheless, they will be examined during the upcoming Cycle 6/7 refueling outage and replaced if the material is determined to be not acceptable for the application.
A-3530	With respect to Supplement 1 to NUREG-0737 item titled "Regulatory Guide 1.97 (R.G. 1.97) - Application to Emergency Response Facilities" Con Edison in all the above mentioned letters did not make a schedular commitment to implement the conclusions of the R.G. 1.97 summary report describing how the requirements of Supplement 1 to NUREG-0737 have been or will be met by December, 1985 as stated in the attachment to the June 12, 1984 Confirmatory Order (page 1 of the attachment, item 3b and page 2 of the attachment, item 5 footnote). In fact in the first paragraph of page 1-20 of our April 15, 1983 submittal we stated, in part, "However, following completion of the Regulatory Guide 1.97 review and any initial design efforts that may be required as a part of it, finalization of the implementation schedule will then be possible.
A-3542	You will recall that that Order confirmed December 31, 1986 as the date for full operation/training for SAS/SPDS. However, as discussed below, a change in that date to April 30, 1988 is necessary.
A-3606	Nondestructive examination of the Auxiliary Spray Line, as required by Action Item 2 of the Bulletin, will be performed during the next refueling outage, scheduled too begin on March 15, 1989. The nondestructive examinations will be accomplished to the degree permitted by component design and geometry. For example in the case of socket welds, surface examinations will be used in lieu of volumetric examinations.
A-3607	Action Item 3, which requires planning and implementation of a program to provide continuing assurance that unisolable sections of all piping connected to the RCS will not be subjected to combined cyclic and static thermal and other stresses, will also be completed during the outage.
A-3609	We now intend to extend this effort to pumps and additional valves, so that the entire IST scope will be re-assessed. We have developed selection criteria and expect that the component review process will take about six months. The IST Program will subsequently be revised to reflect the results of this study.
A-3722	2. B-P Snubbers Accessible During Reactor Operation Repair any defective snubbers that are accessible during reactor operation as outlined in 1 above. Reinspect all accessible snubbers every 30 days or less and repair defective units as needed.
A-3723	3. Snubbers Manufactured by Vendors Other than B-P During the required inspection of B-P snubbers, inspect all snubbers supplied by manufacturers other than Bergen-Patterson
A-3724	4. Reporting Requirements Report the results of all inspections and any repair or corrective action taken to the Directorate of Licensing within 15 days after inspection.
A-3920	Commitment from the licensee to provide the NRC with their plans for a preventive maintenance program for verifying the proper condition of electrical connectors in the station.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-3926	The licensee committed to comply with the SMM requirements of Item II.F.2 of the Post-TMI Requirements for Operating Reactors published in NUREG-0737 (11/80). Compliance will be by providing two separate (i.e., redundant) fully qualified Combustion Engineering SMM systems. Each system will include core exit thermocouples and a microprocessor and control room readout. The thermocouples will be installed during the March 1989 refueling outage and the balance of the SMM systems will be completed then or during the next refueling outage, currently scheduled for May 1990. The licensee will document this commitment next month.
A-3927	The licensee now plans to resolve NRC concerns by switching to RCP trip criteria based on RCS subcooling. These licensee plans will mesh with the licensee plans for the SMM systems. Details will be provided in writing next month.
A-3930	We understand that you will revise your submittal with respect to the initial RT(ndt) and the margin, and that the conclusions drawn regarding when the screening criterion will be reached will be revised to a date well beyond end of life.
A-3985	In addition you stated that, between the scheduled 1995 and 1997 outages, you will perform on line testing to detect potential corrupted signals and you will monitor the progress and experience with the current order modification made at other facilities.
A-3992	. . . Con Ed, in its letter of April 5, 1995, has committed to utilize enhanced and improved inspection techniques as they are developed and verified for use. Con Ed described a number of proprietary advanced inspection techniques that are currently under development, and stated that alternate inspection techniques may be applied as they become available, as long as they can be demonstrated to provide the same or a greater degree of accuracy as the method described in the reports submitted to and accepted by the NRC staff.
A-3993	Con Ed has committed that for any tube indication in this area [span between sleeves in which there is reduce "fill-factor"], a further inspection will be performed by an alternate technique, such as a surface riding probe, in order to determine the acceptability of the sleeved tube for further service.
A-3994	In addition, Con Ed has committed that, for any change in the eddy current signature of the sleeve or sleeve/tube joint region, a further inspection will also be performed by an alternate eddy current technique in order to determine the acceptability of the sleeved tube for continued service.
A-4036	Con Edison has committed to take actions to address the identified [TS] deficiencies through testing, procedure revision, and changes to the TSs prior to restart where required.
A-4069	Con Edison intends to provide a supplemental response to the NRC by May 28,1999, to fully describe the GL 96-01 study.
A-4200	INSERVICE INSPECTION, INCLUDING CODE REPAIR AND REPLACEMENT OF PREVIOUSLY NON-CODE PIPING, PUMPS AND VALVES THAT ARE PART OF THE CONTAINMENT SYSTEM, OR WHICH PENETRATE OR ARE ATTACHED TO THE CONTAINMENT VESSEL, ARE NEWLY DESIGNATED CLASS 2. THIS DESIGNATION IS IN ACCORDANCE WITH THE RULES OF THE 1992 CODE, WITH 1992 ADDENDA. THESE NEW CLASS 2 COMPONENTS ARE IDENTIFED AS QUALITY GROUP E AND WILL BE INSPECTED AND MAINTAINED TO THE RULES OF ASME SECTION XI, 1989 EDITION AND THE INSERVICE INSPECTION PROGRAM AS REQUIRED FOR CLASS 1, 2 AND 3 COMPONENTS.
A-4201	Con Edison will continue to inspect those available portions (approximately 81%) of the three welded attachments on one of four pumps that are accessible using the liquid penetrant method. Con Edison will perform a VT-1 visual examination on 100% of the integrally welded attachments on the selected pump.
A-4202	The surface examination will be performed as required by the Code. Based on the tracking and trending of previously identified conditions, recommendations will be made on the number and locations of welds to be examined. These will be examined using the radiographic technique for wall thinning.
A-4218	In support of Relief Request No. 53, Con Ed also committed that ultrasonic test (UT) Level III personnel performing Appendix VIII examinations would demonstrate their proficiency with a UT performance demonstration, thereby, satisfying the demonstration criterion in CP-189.

IP2 COMMITMENT CHANGE SUMMARY REPORT

COMMIT #	DESCRIPTION
A-10290	ENTERGY IS MAKING A REGULATORY COMMITMENT TO PROVIDE OCCUPATIONAL EXPOSURE INFORMATION TO THE NRC ANNUALLY, IN ACCORDANCE WITH 10 CFR 20.2206, TO SUPPORT THE APPORTIONMENT OF STATION DOSES TO DIFFERENTIATE BETWEEN THE OPERATING AND SHUTDOWN UNITS. THE DATA WILL PROVIDE THE SUMMARY DISTRIBUTION OF ANNUAL WHOLE BODY DOSES AS PRESENTED IN APPENDIX B OF NUREG-0713 FOR OPERATING AND SHUTDOWN UNITS. THIS COMMITMENT TO PROVIDE OCCUPATIONAL EXPOSURE INFORMATION WILL BE INCLUDED IN THE TECHNICAL REQUIREMENTS MANUALS FOR IP2 AND IP3. DUE DATE IS 30 DAYS FOLLOWING NRC APPROVAL OF THE LICENSE AMENDMENT REQUEST. 10/2/2018 Change Date
A-10462	ENTERGY WILL PERFORM SEISMIC WALKDOWNS AT IP2 FOR INACCESSIBLE ITEMS LISTED IN SECTION 7.1 [OF ENTERGY'S EXPEDITED SEISMIC EVALUATION PROCESS REPORT (CEUS SITES)]
A-10463	ENTERGY WILL GENERATE HCLPF CALCULATIONS FOR IP2 INACCESSIBLE ITEMS LISTED IN SECTION 7.1 [OF ENTERGY'S EXPEDITED SEISMIC EVALUATION PROCESS REPORT (CEUS SITES)]
A-10464	ENTERGY WILL IMPLEMENT ANY NECESSARY IP2 MODIFICATIONS FOR INACCESSIBLE ITEMS LISTED IN SECTION 7.1 [OF ENTERGY'S EXPEDITED SEISMIC EVALUATION PROCESS REPORT (CEUS SITES)] BASED ON THE SCHEDULE COMMITMENT TO COMPLETE THIS ACTIVITY IN NL-13-069 DATED APRIL 29, 2013
A_10466	ENTERGY WILL SUBMIT A LETTER TO NRC SUMMARIZING THE IP2 HCLPF RESULTS AND CONFIRMING IMPLEMENTATION OF THE PLANT MODIFICATIONS ASSOCIATED WITH THE IP2 COMMITMENTS TO COMPLETE MODIFICATIONS FOR INACCESSIBLE ITEMS AND MODIFICATIONS OF THE RWST AND FIRE WATER STORAGE TANK
A-10482	FOR THE FIRE WATER PROGRAM, IMPLEMENT LRA SECTIONS A.2.1.13, A.3.1.13 AND B.1.14, AS SHOWN IN NL-14-147.
A-10483	IMPLEMENT LRA SECTIONS A.2.1.13, A.3.1.13 AND B.1.14, AS SHOWN IN NL-15-019.
A-10486	ENHANCE THE SERVICE WATER INTEGRITY PROGRAM BY IMPLEMENTING LRA SECTIONS A.2.1.33, A.3.1.33 AND B.1.34, AS SHOWN IN NL-14-147.
A-10489	FOR THE FIRE WATER PROGRAM, IMPLEMENT LRA SECTIONS A.2.1.13, A.3.1.13 AND B.1.14, AS SHOWN IN NL-14-147.