

John D. O'Toole  
Vice President

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

September 15, 1982

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

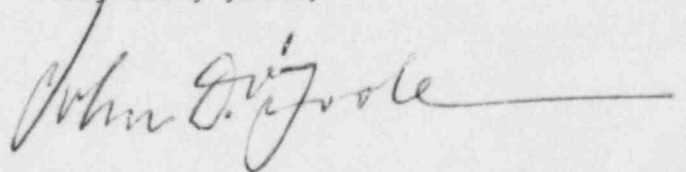
Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

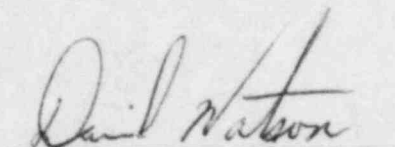
This refers to I.E. Inspection 50-247/82-14, conducted by Messrs T. Rebelowski and P. Koltay of your office on July 1 through 31, 1982 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your August 16, 1982 letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed therewith as Appendix A. Our response to the item of non-compliance is presented in Attachment A to this letter.

Our response is being provided pursuant to Section 182 of the Atomic Energy Act of 1954 as amended. Should you or your staff have any questions, please contact us.

Very truly yours,



Subscribed and sworn to  
before me this 15 day  
of September, 1982.

  
Notary Public

DAVID WATSON  
Notary Public State of New York  
No. 03-4604876  
Qualified in Bronx County  
Commission Expires March 30, 1983

ATTACHMENT A  
RESPONSE TO NOTICE OF VIOLATION  
APPENDIX A

VIOLATION

Technical Specification 6.8.1 requires that written procedures be established and implemented. Procedure COL-51, Locked Valves, Revision 14, requires the licensee to verify the position of the valves identified in this procedure. Chain and padlock are to be applied to each of these valves.

Contrary to the above, on July 14, 1982, the inspector identified Valve No. 1279, a recirculating bypass valve on the No. 23 Charging Pump, which appears on Procedure COL-51, as unchained and not padlocked.

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

RESPONSE

When Valve No. 1279 was found unlocked during the inspection on July 14, 1982, Con Edison verified that the valve was in the correct position and then locked the valve in accordance with COL-51. It should be noted that Procedure COL-51, Locked Valves, requires a monthly check for compliance and the unlocked condition would have been detected and corrected in accordance with station procedure.

On July 8, 1982 the valve had not been locked at the completion of a Post Maintenance Test/Inspection and return to service of No. 23 Charging Pump. The test did not include a review requirement for compliance with COL-51.

To avoid such a violation in the future, Con Edison will ensure that Post Maintenance Tests/Inspections provide for the requirements of COL-51. All Post Maintenance Tests/Inspections issued after November 1, 1982 will contain a provision for verification by Operations that the requirements of COL-51 have been met. In the interim the Senior Watch Supervisors have been instructed to conduct appropriate reviews of equipment for compliance with COL-51 prior to returning equipment to service.