

John D. O'Toole
Vice President

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

March 18, 1982

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

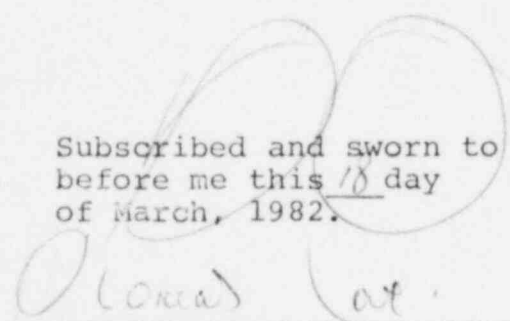
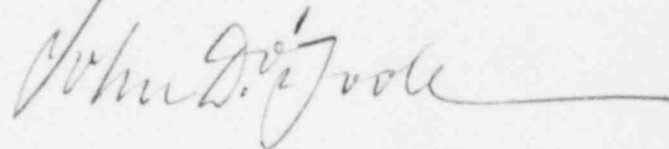
Mr. Richard W. Starostecki, Director
Division of Resident and Project Inspection
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/82-01, conducted by Mr. T. Rebelowski, Senior Resident Inspector, on January 1-31, 1982 of activities authorized by NRC license No. DPR-26 at Indian Point Unit No. 2. Your February 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 1954 as amended. Should you or your staff have any questions, please contact us.

Very truly yours,



Subscribed and sworn to
before me this 18 day
of March, 1982.

Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1983

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attach.

cc: U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D. C. 20555

Mr. T. Rebelowski, Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

Violation A

Criterion VI 10 CFR 50, Appendix B, Document Control states, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings..."

Station Administrative Order (SAO) No. 102, Revision 6, in Paragraphs 2.5.8 and 2.5.12, which describe Section Head responsibility, states in part, "He shall assure that procedure distribution lists are current and updated (or make new list(s) and document same each time procedures are distributed," and, "assure that the latest approved revisions of procedures are available and followed as required."

Contrary to the above, during the inspection period January 1-31, 1982, the inspector identified incorrect revisions to Controlled Procedures in the Central Control Room, Watch Foreman's Office, Nuclear and Conventional Operator's Offices and the Radiation Waste Supervisor's Office.

This is a Severity Level V Violation, Supplement I.

Response

Upon identification of certain procedures that were not being maintained up-to-date at several locations in the station, the procedures at these locations were promptly reviewed and brought up-to-date. We believe that this immediate corrective action was effective in assuring that station personnel would have available the correct procedures.

The procedures in the Central Control Room, Watch Supervisor's Office, Nuclear Plant Operator's Office and Conventional NPO Office had not been maintained up-to-date due to deficiencies in the Operations Administrative Directive No. 7, entitled Procedure Control. This Administrative Directive will be revised to require up-to-date procedures at specified locations including the Central Control Room, the Watch Supervisor's Office, the Nuclear Plant Operator's Office and the Conventional NPO's Office. In addition the Administrative Directive will be revised to require a semi-annual review of all controlled procedures within the Operations section. The frequency of these audits may be increased if warranted by the results of the first audit. The revisions to this Administrative Directive will be completed May 15, 1982.

The failure to maintain up-to-date copies of procedures in the Radwaste General Supervisor's Office was due to the lack of a formal procedure control system in this newly formed section. The Radwaste General Supervisor has been instructed in the need to maintain controlled copies of procedures and a procedure control system has been developed. In addition the Radiation Protection section, which issued the controlled procedures referred to in the NRC inspection report, has increased the frequency of auditing all controlled copies of procedures to provide additional assurance that the current revisions are on file.