

John D. O'Toole  
Vice President

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

October 18, 1982

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

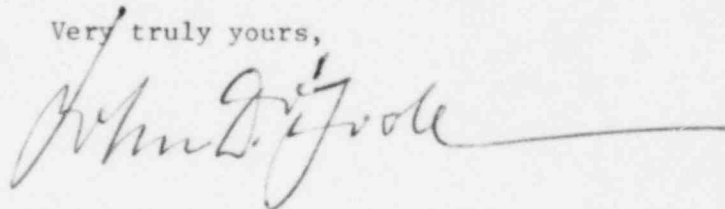
Mr. Richard W. Starostecki, Director  
Division of Resident and Project Inspection  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

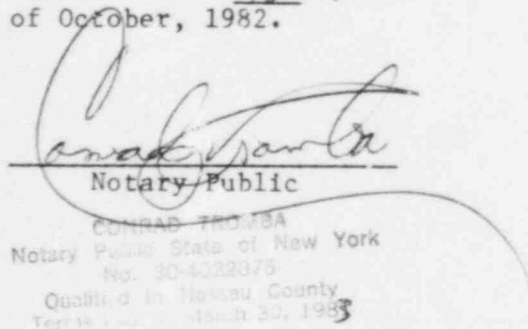
This refers to I.E. Inspection 50-247/82-18, conducted by Messrs. T. Rebelowski and R. Koltay of your office on August 1-31, 1982 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your September 17, 1982 letter stated that it appeared that one of our activities was not conducted 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 18<sup>th</sup> day  
of October, 1982.



Notary Public  
CONRAD TROMBA  
Notary Public State of New York  
No. 30-4022375  
Qualified in Nassau County  
Term Expires March 30, 1983

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

APPENDIX A

VIOLATION

10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures... of a type appropriate to the circumstances..."

The licensee's Quality Assurance Program for Operating Nuclear Plants, CI-240-1, Section X, requires that the licensee's procedures reflect and incorporate technical specification engineering requirements and parameter limits applicable during the operation of the plant.

Technical Specifications, Section 1.7d, defines containment integrity as a condition which exists when all automatic containment isolation valves are either operable or in the closed position. Technical Specifications, Section 3.6A does not provide for reopening failed automatic containment isolation valves.

Contrary to the above, Procedure A-26, Loss of Containment Integrity, Revision 0, permits periodic reopening of a failed automatic containment isolation valve during plant operations.

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

RESPONSE

Upon making an initial determination that Section 5.4 of Procedure A-26, Loss of Containment Integrity, Revision 0 specified no time limit on loss of containment integrity beyond which corrective action would be required and thus appeared to be in conflict with the intent of Section 3.6 of the Technical Specifications, the procedure was reviewed that day at a meeting of the Station Nuclear Safety Committee. The Committee recommended that the procedure be revised to eliminate that discrepancy with the Technical Specifications.

Technical Specification 3.6.A.4 states that "if containment integrity requirements are not met when the reactor is above cold shutdown, containment integrity shall be restored within four hours...".

Operations immediately issued Temporary Procedure Change, TPC-82-101, to Section 5.4 of Procedure A-26 to clarify the requirements of the Technical Specifications.

For all Automatic Containment Isolation Valves, if the requirements of Technical Specification 1.7d are not met within the 4 hours permitted by Technical Specification 3.6.A4, the reactor shall be brought to the cold shutdown condition within the next 36 hours, utilizing normal operating procedures.

This corrective action eliminated the discrepancy between Procedure A-26 and Section 3.6A of the Technical Specifications and achieved full compliance with the requirements of the Technical Specifications and Corporate Instruction, CI-240-1, Quality Assurance Program for Operating Nuclear Plants.