

John D. O'Toole
Vice President

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

January 28, 1983

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:

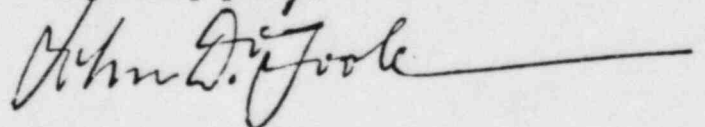
This refers to Inspection 50-247/82-23 conducted by Messrs T. Foley and P. Koltay on November 1-30, 1982, of activities authorized by NRC License No. DPR-26 at Indian Point Station. Your December 30, 1982 letter stated that it appeared that some of our activities were not conducted in full compliance with NRC requirements, as set forth in the notice of violations enclosed therewith as Appendix A & B.

Provided herewith as Attachments A and B is our response to Appendices A and B of Inspection Report 50-247/82-23, respectively.

In accordance with Section 2.790 (d) and 73.21 of the NRC's Rules, Title 10, Code of Federal Regulations, correspondence and reports to or from the NRC which identify a licensee's control and accounting procedures for safeguarding licensed special nuclear materials or detailed security measures for the physical protection of a licensed facility are exempt from disclosure. We, therefore, request that Attachment B be withheld from public disclosure.

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

Very truly yours,



attach.

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

ATTACHMENT A
RESPONSE TO APPENDIX A

Notice of Violation

50-247/82-23

VIOLATION

Technical Specification 6.12.1.6 requires that each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr shall be provided with locked doors to prevent unauthorized entry into such areas.

Contrary to the above, on November 9, 1982, the hallway to the waste holdup tank area, a high radiation area with radiation intensity greater than 1000 mrem/hr, was not locked and did not prevent unauthorized entry.

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

RESPONSE

On November 9, 1982 a Nuclear Plant Operator was working in the high radiation area and left the door unlocked to provide an emergency exit. The resident inspector was allowed to enter the area and was not asked for authorization. The procedures required an additional person to guard the door; however, the operator was working alone.

The operator involved was interviewed the next day by the Operations Superintendent and the Senior Watch Supervisor. The task which he was performing was brief but required him to leave the area where a direct view of the access gate to the high radiation area was possible. He stated that he did not challenge the inspector because his stay was momentary and he observed him to have departed the area immediately. The operator then left the area shortly afterwards and secured the gate.

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Attachment A (Cont'd)

To prevent similar events from recurring, a letter was issued to all Senior Watch Supervisors and Support Facilities Supervisors on November 18, 1982 to reinstruct all Operations personnel to follow the two man rule for access gates to high radiation area which are secured with padlocks. The November 18, 1982 letter, being a Unit Order, required written acknowledgement by these supervisors and filing of the same in the Unit Order Book in the Central Control Room.

ATTACHMENT B
RESPONSE TO APPENDIX B

Notice of Violation

50-247/82-23

THIS PAGE, CONTAINING SAFEGUARDS INFORMATION,
NOT FOR PUBLIC DISCLOSURE,
IS INTENTIONALLY LEFT BLANK.