

John D. O'Toole
Vice President

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December 2, 1983

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

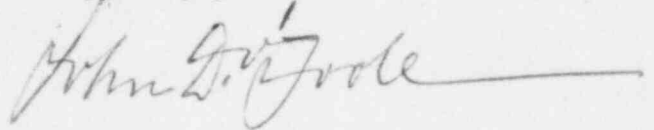
Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Starostecki:

This refers to I.E. Inspection 50-247/83-21 conducted by Messrs. T. Foley and P. Koltay of your office on September 1 through October 17, 1983 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your November 3, 1983 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 Violation enclosed therewith as Appendix A. Our response to the items of non-compliance is presented in Attachment A to this letter.

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

Very truly yours,



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

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ATTACHMENT A

REPOSE TO NOTICE OF VIOLATION

Appendix A

VIOLATION A

Title 10 of the Code of Federal Regulations, Part 50.59 requires that a determination be made to determine whether a change to the facility as described in the Safety Analysis Report constitutes an Unreviewed Safety Question.

Contrary to the above, a change to the facility, by the installation of SOV 3416, 3417, 3418 and 3419 on the Reactor Coolant Drain Tank and the Pressurizer Relief Tank, as described in the Indian Point Unit 2 Safety Analysis Report was made, without making a determination whether an Unreviewed Safety Question did or did not exist.

This is a Severity Level IV Violation (Supplement 1).

RESPONSE

In immediate response to the violation, a separate safety evaluation was prepared for the solenoid operated valves (SOVs), not included in the original safety evaluation. This evaluation was completed on September 23, 1983 and indicated that the installation of these valves does not constitute an unreviewed safety question as described in 10 CFR 50.59.

Con Edison's review of this event determined that although the modification procedure properly identified the valves in question, the responsible engineer inadvertently omitted them from the request for a safety evaluation. We believe this to be an isolated event. Engineering Procedure OP-290-1 which includes procedures for modification control and safety evaluations has been revised since the modification package in question was installed to more specifically delineate the actions to meet the requirements of 10 CFR 50.59. Additional revisions of this procedure

as of October 7, 1983 implement modification procedure reviews from the scoping document stage to the procedure issuance stage, further assuring identification by cognizant organizations of all aspects of modifications that must meet the requirements of 10 CFR 50.59. Responsible individuals have been retrained in the revisions to these procedures.

VIOLATION B

Technical Specification 6.5.1.6 states: "The Station Nuclear Safety Committee shall be responsible for ...(f) Review of facility operations to detect potential safety hazards."

Contrary to the above, the Station Nuclear Safety Committee (SNSC) did not detect the potential safety hazard associated with the Safety Injection Pump test line weld crack and potential failure of the test line, which was first identified on August 6, 1983, and subsequently reviewed by the SNSC on August 23, 1983.

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

RESPONSE

In immediate response to the above violation, a review of SNSC activities over the past several years was conducted, and the lack of adequate review in this case was determined to be an isolated event. In the initial review of the events to determine their significance, SNSC considered whether the event involved: (1) a question of the safety of the plant; (2) a possible unreviewed safety question; and (3) the need for a more critical analysis of reports prepared for presentation to the SNSC with specific reference to documentation for leaks in containment other than at mechanical joints.

To further assure prevention of a recurrence in the future, the in-depth review of plant activities to detect potential safety hazards is being re-emphasized to Station Nuclear Safety Committee members and their alternates. SNSC will also request that additional reports be made per Station Administrative Order 132, "Analysis of Operational Events", when they are needed to assist in the SNSC evaluation of potentially hazardous events. In addition, a set of guidelines covering reviews such as those

performed for a safety evaluation will be issued to SNSC members. These guidelines will be available in the first quarter of 1984. 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.

VIOLATION C

Technical Specification 6.8 requires that administrative policies meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972. ANSI N18.7-1972, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants...", Section 5.1.6.1, "Quality of Equipment" requires that maintenance or modifications that may affect the functioning of safety-related systems, or components shall be performed in a manner to assure quality at least equivalent to that specified in applicable design requirements, and where appropriate sections of related vendor manuals, equipment operating and maintenance instructions, or approved drawings with acceptable tolerances do not provide adequate instruction to assure the required quality of work, a suitably documented procedures shall be provided.

The Consolidated Edison Quality Assurance Program, 1977 Revision commits to have a program which satisfies the requirements and guidelines of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants...." ANSI N18.7-1976, Section 5.2.19.3, "Tests Associated with Plant Maintenance, Modification or Procedure Changes", states, "Tests shall be performed following plant modifications or significant changes in operating procedures to confirm that the modification or changes reasonably produce expected results, and that the change does not reduce safety of operations."

Contrary to the above, during the installation of SOV 1296 and 1296A, associated with Modification MM 77-2-06, Revision 1, on Fan Cooler Unit No. 22, the licensee failed to provide a suitably documented procedure to assure the required quality work, and failed to perform a test following the plant modification which confirms that the modification reasonably produces expected results, and that the modification does not reduce the safety of operations.

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

RESPONSE

Con Edison's review of this event determined the following: (1) the instructions in the modification procedures were not sufficient to insure that the pneumatic circuit was built in accordance with the design; (2) a quality control hold point was not observed by the installer; and (3) the functional test of these circuits was marginal in its ability to confirm that the modification reasonably produced expected results.

To better insure that modification packages provide suitable documentation of the required quality of work, Engineering Procedure

OP-290-1 was revised October 1, 1983 to include the requirement that modification packages contain full construction details, vendor furnished information (including drawings), specifications and support and information drawings as applicable.

Sufficient procedures exist to control inspection hold points and administration of Construction work packages. Special emphasis has been placed on adherence to these procedures by contractor personnel in meetings held with them and as part of their training program.

As an interim measure, the Test and Performance Section is making more extensive reviews of modification packages to identify any prefunctional tests which must be performed by the installer to ensure that the modification reasonably produces expected results. The improvement of modification control had been under active review prior to this event. One of the planned objectives of this review is the revision of appropriate Engineering and Nuclear Power procedures to institute a review by cognizant organizations of a modification procedure from the scoping document stage to the procedure issuance stage. This review will insure a suitably documented modification procedure is written and that it satisfactorily implements the modification. Included will be reviews by the Test and Performance Section to determine that pre-functional checks or tests and inspections are properly specified at the appropriate point in the modification prior to a functional test, and that appropriate functional test criteria have been provided prior to the installation of the modification. These actions assure that post-

maintenance tests are written to confirm that the modification reasonably produced expected results. Engineering procedures that implement these actions were revised as of October 7, 1983. Nuclear Power procedures are scheduled to be revised March 1, 1984.

In addition, to further insure that modifications do not reduce the safety of operations, the SNSC now reviews all post-maintenance tests not previously reviewed.