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Vice President

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November 16, 1983

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

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Penna. 19406

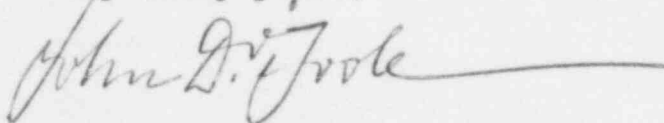
Dear Mr. Martin:

This refers to Inspection 50-247/83-20 conducted by Mr. L. Plisco on August 15-19, 1983 of activities authorized by NRC License No. DPR-26 at Indian Point Station. Your September 8, 1983 letter stated that it appeared that some of our activities were not conducted in full compliance with NRC requirements. This was further set forth in the Notice of Violation enclosed as part of Enforcement Conference Report 50-247/83-20 of October 11, 1983.

Provided herewith as Attachment A is our response to the Enforcement Conference Report 50-247/83-20 and as Attachment B our response to the Notice of Violation.

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

Very truly yours,



Attachment

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

ATTACHMENT A
RESPONSE TO ENFORCEMENT CONFERENCE LETTER

On August 15-19, 1983, Mr. L. Plisco, of the Nuclear Regulatory Commission (NRC), Region I Offices, performed a routine safety inspection at Indian Point Unit 2, in Buchanan, New York. The inspection report indicated that certain of our activities were not conducted in full compliance with NRC requirements. In addition, the enforcement conference report discussed the ongoing and long term corrective actions involving the design modification process and quality assurance controls. This part of our response is addressed to the Enforcement Conference Report which precedes the Notice of Violation.

COMMITMENTS AND DRAWINGS

To correct weakness in commitment identification and tracking, a commitment review task force was initiated on August 29, 1983 to review Operations related commitments in the area of plant modifications as identified by a consultant review. An initial review of these commitments was completed on October 31, 1983. On October 24, 1983 the scope of the consultant commitment review was expanded to such areas as test and surveillance, maintenance and security. It is anticipated that commitments in these areas will be identified by December 31, 1983 and reviewed by April 1, 1984. Implementation of corrective actions arising as a result of the entire commitment review process is planned for completion by December 31, 1984. We are presently exploring methods to enhance our handling of safety related information as described in the Station Administrative Orders. This will result in the improved ability to track commitments and cross reference them to applicable procedures.

Field verification of Control Room drawings, in addition to the reissued drawings for the Fire Protection System was initiated on August 29, 1983. Essentially all walkdowns in accessible areas and in some normally inaccessible areas that became access during the recent maintenance outage are completed. Drawings are being issued as corrections indicated by the walkdowns are resolved. Issuance of these drawings is expected to be completed during December 1983. Verification of Control Room drawings in areas that remain inaccessible is scheduled for completion by the end of the next refueling outage.

MODIFICATIONS

The improvement of the modification control in the areas summarized below has been under an active review that began following the 1982 refueling outage.

The following areas are being reviewed to improve the processing of modifications packages.

- o Enhance scoping document preparation.
- o Control Room and As Constructed drawings operational acceptance requirements.
- o Establishment of construction completion and package withdrawal schedules.
- o Pre/corequisite modification identification.
- o Linking of modification and installer package identification.

Engineering procedures were revised by October 7, 1983 to implement the above. The appropriate Nuclear Power procedures are presently under review and will be revised by March 1, 1984.

A long-term program to schedule drawing restoration and field verification for canceled modifications is under development. The schedule for this program will be available November 30, 1983. Restoration activities have begun. Following this program, systematic inspections involving Engineering, Nuclear Power and Quality Assurance will be instituted to ensure the quality of the drawing record.

QUALITY

Consolidated Edison is committed to improving the quality of its operations in 1983 and 1984. The Company adopted three goals relating to Quality Assurance improvements: upgrade and improve the Quality Assurance Audit Program, expand the Quality Assurance Program to include balance of plant equipment in addition to safety related equipment, and strengthen the Indian Point Quality Assurance organization. Additional resources have been committed to achieving these goals.

In strengthening the Quality Assurance organization at Indian Point, three new manager positions have been added: Manager of Nuclear Power Quality Assurance, a Manager-Nuclear Power Quality Assurance Engineering and a Manager-Nuclear Power Quality Control. The number of positions assigned to Indian Point has been increased 30% from 1982 to 1983. The ratio of engineering personnel to technician personnel has been increased. The number of Senior Quality Assurance Engineers and Quality Assurance Engineers has been increase from 1 in 1982 to 9 for 1983, to provide an improvement in the technical competency of the organization.

The frequency of Quality surveillance and monitoring activities has been increased 100% over 1982 and expanded to more areas. Senior Engineers and Engineers have been assigned monitoring activities (in addition to the technicians) to provide more technical competence. Reporting has also been improved to define for the management of the station those areas requiring attention, and to provide more feedback to Quality Assurance of the corrective measures taken.

In the 4th Quarter 1982 the Quality Assurance Audit staff, which had reported to the Director QA&R, was organized into a section and a manager was appointed to coordinate its activities. In 1983, there is a company goal to expand the audit program to 70 audits a year from a previous level of 50. In 1984 the goal is to perform 80 audits, an increase of 60% over the 1982 level. The auditor's staff is comprised of Senior Engineers and Consultants and the budget has been increased to expand use of Consulting Firms with expertise not available internally.

The scope of audits was increased and the Audit Program was modified. Formal corrective action is initiated prior to the issuance of the final audit report. It is intended that responses will include, in addition to correcting those discrepancies noted, an evaluation to determine the root cause of the observed deficiencies and positive plans to prevent recurrence. Trending has been improved. A report is issued by the manager of Quality Audits to senior company management and the Nuclear Facility Safety Committee (Off Site Review Committee) summarizing strengths and weaknesses within the company, highlighting areas needing attention.

An additional company goal in 1983 is to define an expanded Quality Assurance Program for equipment in the balance of the plant (in addition to safety related equipment). In 1984 increased funds are budgeted to provide this expansion.

ATTACHMENT B
RESPONSE TO NOTICE OF VIOLATION

In the Notice of Violation, dated October 11, 1983, the following violations were identified.

Violation

A. Facility Operating License No. DPR-26 Paragraph 2.k requires the licensee to complete the modification identified in Paragraph 3.1.20 of the NRC's Fire Protection Safety Evaluation on the facility dated January 31, 1979, no later than October, 1980. Paragraph 3.1.20(4) requires that "...the specified auxiliary equipment specified by NFPA-24 will be added to the seven existing hose houses."

Contrary to the above, on August 17, 1983, some of the specified auxiliary equipment specified by NFPA-24, such as one fire ax, four coupling spanners, and two hose coupling gaskets, was not available in the hose houses.

This is a Severity Level V violation (Supplement 1).

Response

The equipment required by NFPA Number 24 (outside Protection-1977), which was not already provided in the hose boxes, while not present on August 17, 1983, was purchased and provided in each box by September 8, 1983. A temporary Procedure Change (TPC) to the existing Surveillance Test PT-M44, Rev. 1 (Fire Hose Box Test) was issued adding the additional equipment and PT-M44 was performed on September 8, 1983. To ensure future compliance with NFPA Number 24, a revision of PT-M44 (Rev. 2), which incorporates the TPC, was approved on September 12, 1983.

In addition, temporary signs prohibiting tampering with the equipment in the fire hose boxes were posted on September 9, 1983. Permanent signs were affixed to each box by September 13, 1983.

Violation

B. Facility Operating Licensee No. DPR-26 Paragraph 2.k requires the licensee to complete the modification identified in Paragraph 3.1.10 of the NRC's Fire Protection Safety Evaluation on the facility dated January 31, 1979, no later than October, 1980. Paragraph 3.1.10 requires that "All valves whose closure could cause loss of water to hose stations or sprinkler systems serving safety-related areas in the fire water system will be locked, electrically supervised or provided with tamper indication seals and periodic checks."

Contrary to the above, on August 17, 1983, at least 25 valves whose closure could cause loss of water to hose stations or sprinkler systems serving safety-related areas in the fire water system were not locked, electrically

supervised or provided with tamper indication seals and periodic checks.

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

Response

All main sectional and isolation valves not already locked or electrically supervised were sealed with tamper indication seals by August 19, 1983. A Temporary Procedure Change (TPC) to the existing Surveillance Test PT-M35, Rev. 9 (Fire Protection System) was issued providing for the checking of lead seals and PT-M35 was performed by August 19, 1983 ensuring compliance. A revision of PT-M35 (Rev. 10), which incorporates the TPC and a provision for resealing missing seals, was approved on September 12, 1983.

Also, a Temporary Procedure Change (TPC) to the existing Surveillance Test PT-A18, Rev. 3 (Valve Cycling Check Off List) was issued on August 18, 1983 providing for the checking of lead seals. A Revision of PT-A18 (Rev. 4), which incorporated the TPC was approved on September 12, 1983.

A review and analysis of the Fire Protection System was conducted to document those Fire Protection valves whose closure could cause loss of water to hose stations or sprinkler systems serving safety related areas. We then instituted a review to determine on a case-by-case basis which of the valves did not require tamper indication, which valves serving safety-related areas should continue to be supervised with lead seals to facilitate ease of operation and which ones should be chained and locked. Based on the initial determination chains and locks were installed in place of lead seals on certain valves and lead seals were removed from valves not serving safety-related areas. This was done by October 31, 1983.

Revisions of PT-M35 (Rev. 11) and PT-A18 (Rev. 5) which incorporate locking valves and designating the safety related valves were approved on October 14, 1983.

To correct weaknesses in commitment identification and tracking that contributed to this and other deficiencies noted in the Notice of Violation, a commitment review task force was initiated on August 29, 1983 to review Operations related commitments as identified by a consultant review. An initial review of these commitments was completed on October 31, 1983.

Violation

C. Facility Operating License No. DPR-26 Paragraph 2.k requires the licensee to complete the modification identified in paragraph 3.1.23 of the NRC's Fire Protection Safety Evaluation on the facility dated January 31, 1979, no later than October, 1980. Paragraph 2.k also requires the licensee to implement and maintain the administrative controls identified in Section 6 of the same document. The administrative controls were to be in effect by June 1, 1979. Paragraph

3.1.23 states that "Procedures will be changed to include provisions of the fire plan describing how staff guidelines on fire protection administrative controls are met." Section 6 states that plans and procedures stipulating the management and staff organization and its qualifications; the fire brigade training program; and the prefire plans for fighting fires are being revised or developed and implemented.

Contrary to the above, as of August 19, 1983, the plans and procedures stipulating the management and staff organization and its qualifications; the fire brigade training program; and the prefire plans for fighting fires had not been revised or developed and implemented to include the provisions of the staff guidelines on fire protection administrative controls.

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

Response

A Revision of SAO-114 (Rev.5) which includes a functional description of fire protection organizational responsibilities, was approved on September 12, 1983 ensuring compliance. Under this revision, the responsibility for the implementation of the station's Fire Protection and Prevention Program was consolidated under the Fire & Property Protection Engineer. The following related documents were revised or developed: Fire & Property Protection Engineer's Position Guide (September 8, 1983), Technical Specifications for the organization responsibilities for the Fire Protection Program (Revision submitted on September 29, 1983), Technical Engineering Administrative Directive - TEAD 5 (September 20, 1983).

SAO-114 is being further revised (Rev. 6) to include additional requirements for controlling combustibles and transient loads, ignition sources, fire protection equipment impairments and removal/reinstallation of Fire Rated Assemblies (penetration seals, fire barriers, fire doors and fire dampers). This revision is scheduled for approval on November 25, 1983.

The Indian Point Training Manual, Section 15 "Fire Brigade Training" was revised (September 3, 1983) to include specific procedural requirements for the existing fire brigade leader training.

Additional prefire plans for specific plant areas, including safety related areas, were developed by September 9, 1983. A total of 33 prefire plans now exist, which will be drill tested for feasibility and completeness by September, 1985.

Violation

D. Technical Specification 4.14.A.1.f requires a valve position check once per month of each valve in the flow path necessary for proper functioning of any portion of the high pressure water fire protection system required for protection of safe shutdown systems.

Technical Specification 4.14.A.1.g requires that these same valves be exercised through at least one complete cycle once every twelve months.

Contrary to the above, as of August 17, 1983, neither the valve position check nor the valve cycling test had been performed on at least nine valves in the high pressure water fire protection system required for protection of safe shutdown systems since the valves were installed in April and June, 1981. Furthermore, the surveillance test used to complete the monthly valve position check was inadequate in that many valves were identified incorrectly and it did not include all of the valves with installed monitoring systems.

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

Response

Temporary Procedure Changes (TPC) to existing Surveillance Tests PT-M35, Rev. 9 (Fire Protection System) and PT-A18, Rev. 3 (Valve Cycling Check Off List) were issued, including all safety related valves, and the tests were performed for those valves added by TPC, by August 19, 1983, thus ensuring compliance. Revisions of both PT-M35 (Rev. 10) and PT-A18 (Rev. 4) to incorporate the TPC's were approved on September 12, 1983.

A review and analysis, including a system line walk, of the Fire Protection System was conducted to document those FP valves whose closure could cause loss of water to hose stations or sprinklers serving safety related areas to verify valve location, numbering and tagging and to clarify and correct the Fire Protection Drawings. All valves have been assigned numbers, and tagged as of September 13, 1983. Revision of both PT-M35 (Rev. 11) and PT-A18 (Rev. 5), which incorporate safety related designation, valve numbering, and accurate descriptive locations were approved on October 14, 1983 ensuring compliance. Concurrent with the above activity, Fire Protection surveillance tests were reviewed for compliance and completeness. This review was completed October 1, 1983.

A related procedure, C.O.L. 29.6 (Fire Protection), was revised September 12, 1983 to include all safety related valves, correct valve numbering and accurate descriptive locations.

Violation

E. 10 CFR 50, Appendix B, Criterion III and VI require measures to be established to control the issuance of drawings, including changes thereto, and that design changes be subject to design control measures commensurate with those applied to the original design.

Consolidated Edison Corporate Instruction CI-240-1, Quality Assurance Program for Operating Nuclear Plants, requires that revised drawings, approved by Engineering, be printed and distributed for record within six weeks of receipt of the "As-constructed" documents.

Contrary to the above, as of August 19, 1983, the station drawings of the fire protection system did not reflect the modifications completed on the

system in April and June, 1981. An accurate drawing of the fire protection system was not available.

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

Response

The fire protection system was walked down on August 19, 1983 to verify flow path, valve location, numbering and tagging. As a result, by September 12, 1983, existing fire protection diagrams in the Central Control Room (CCR) set were revised, new fire protection diagrams for the CCR set were made and the CCR set for the as-constructed Fire Protection System was issued, thus ensuring compliance. In addition, Fire Protection physical piping drawings were revised and issued November 1, 1983.

To ensure that the entire CCR drawing set is up-to-date, field verification of the remaining CCR drawings was initiated on August 29, 1983. Essentially all walkdowns in accessible areas and in some normally inaccessible areas that became accessible during the recent maintenance outage are completed. Drawings are being issued as corrections indicated by the walkdowns are resolved. Issuance of these drawings is expected to be completed during December 1983. Verification of these CCR drawings in areas that remain inaccessible is scheduled for completion by the end of the next refueling outage.

In conjunction with the above, System Description 29.6 (City Water and Fire Protection) was revised for drawing changes on September 12, 1983. In addition, the appropriate sections of the FSAR will be revised by July, 1984.

To prevent recurrence of the problems leading to the above drawing deficiencies, design procedures were revised to include 1) identification, in the modification procedure, of the associated information drawings which must be revised as part of the as-constructed drawing process (October 4, 1983) and 2) in the design check list, a review of related drawings against current revision levels when updating "As-constructed" drawings (September 8, 1983). Station Administrative Order 122 Drawing Controls, is presently under review to provide for drawing revisions for as-found conditions and to better define the process for Control Room Drawing updates. This station procedure and appropriate departmental procedures will be revised by March 1, 1984.

In addition, the process to improve the above modification control has been under an active review that began following the 1982 refueling outage. In immediate response to the above deficiencies linked to the modification process, Engineering recalled all plant modifications not issued for installation in the plant on August 24, 1983 and "issued but inactive" packages on September 12, 1983. As of November 1, 1983, Engineering completed review and identified planned actions to be taken on 171 of 178 recalled modification.

A longer-term program to schedule drawing restoration to current engineered status and field verification for canceled modifications is under development. The schedule for this program will be available November 30, 1983. Restoration activities have begun. Following this program, systematic inspections involving Engineering, Nuclear Power and Quality Assurance will be instituted to ensure the quality of the drawing record.

The following areas are being reviewed to improve the processing of modification packages.

- o Enhance scoping document preparation.
- o Control Room and As Constructed drawing operational acceptance requirements.
- o Establishment of construction completion and package withdrawal schedules.
- o Pre/corequisite modification identification.
- o Linking of modification and installer package identification.

Engineering procedures were revised by October 7, 1983 to implement the above. The appropriate Nuclear Power procedures are presently under review and will be revised by March 1, 1984.