

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003

September 27, 1973

Indian Point Unit No. 2
Docket No. 50-247
A.O. 3-2-12

Mr. John F. O'Leary, Director
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. O'Leary:

On September 13, 1973 during maintenance of the closure mechanism of the 80' elevation outer door of the vapor container, and while the reactor was in a shutdown condition, the inner door was partially opened for a short period. An investigation was undertaken to determine the cause of the occurrence. This investigation included discussions with personnel involved as well as a review of station procedures relating to the maintenance of these doors and other safety interlocks at Indian Point Unit No. 2.

As a result of this investigation, we have revised and supplemented our procedures so as to prevent not only a recurrence of this particular condition but also to prevent similar conditions in the facility.

Our corrective action includes several tiers of precautions. The first tier is designed to minimize the need for maintenance of the doors of the vapor container. This will be accomplished by having a member of the operating force open and close the doors when passage by non-operating personnel is required, and the facility is not in a cold shutdown condition as defined by the Technical Specifications. At such times, the door operator will also maintain surveillance of the interlock mechanism to assure its continued operability.

The second tier includes specific precautions to prevent recurrence of this condition. Signs have been posted in the entrance chamber in those places where the interlock can be overridden requiring that the mechanical interlock not be de-

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feated without prior approval by the Watch Foreman. The procedures further require that prior to commencement of maintenance on these doors, or the interlock mechanism, signs must be posted notifying persons not to attempt to use these doors. In addition to such signs, the procedures require that prior to the commencement of maintenance, an individual must be stationed to prevent the improper use of these doors during the period required for maintenance.

The third tier is designed to prevent similar conditions in the facility. Approved procedures set forth instructions for the controlled defeat of any electrical or mechanical interlocks in the facility for maintenance purposes.

As previously indicated, at the time of the reported condition, the reactor was in a shutdown condition (1900F with a shutdown margin $> 4\% \Delta k/k$). There are, therefore, considered to be no safety implications to the occurrence.

Our Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee have reviewed this occurrence and approve the corrective actions taken.

Very truly yours,

Warren R. Cobean, Jr.
Warren R. Cobean, Jr.
Manager - Nuclear Power
Generation Department

cc/ Mr. James P. O'Reilly