

John D. O'Toole  
Vice President

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

May 11, 1984

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

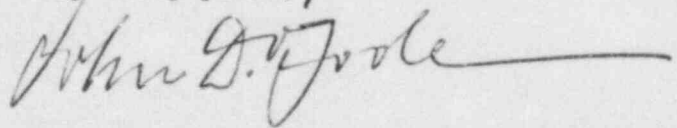
Mr. Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Dear Mr. Martin:

This refers to I.E. Inspection 50-247/84-07 conducted by Mr. H. Bicehouse of your office on February 27, 1984 of activities authorized by NRC License No. DPR-26 at Indian Point Unit No. 2. Your April 11, 1984 letter stated that it appeared that certain 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

Response to Notice of Violation

Appendix A

VIOLATION

Technical Specification 6.8 requires, in part, that written procedures be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 of ANSI N18.7-1972. ANSI N18.7-1972 requires, in part, that changes to procedures be distributed to and used by the personnel performing the prescribed activity.

Contrary to the above, changes to Health Physics Instruction No. 2.28, "Instructions to H.P. Technicians Assigned to V.C. Control Point," were made effective February 16, 1984. The licensee failed to assure that all Health Physics Technicians required to perform the prescribed activity were notified of the change. Procedures for reading/acknowledgement, posting and distribution of the changes had not been completed on February 27, 1984.

This is Severity Level V Violation (Supplement IV).

RESPONSE

All personnel assigned to the activity associated with Health Physics Instruction No. 2.28 were verbally informed of the changes to this instruction to assure they were aware of these changes. This was done when they reported for their first workshift during which the instruction was in effect. This training was completed for all Health Physics Technicians on February 17, 1984.

To ensure that the requirements of Technical Specification 6.8 are met for Environmental Health and Safety Department procedures (and procedure changes), a new procedure has been developed. It includes provisions for posting and reading/acknowledgement of procedures in addition to existing requirements for the distribution and receipt/acknowledgement of procedures. This procedure is scheduled for implementation by June 1, 1984.

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