

John D. O'Toole  
Vice President

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

November 25, 1984

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

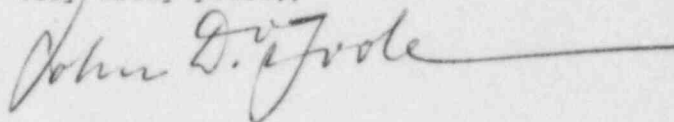
Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Dear Mr. Martin:

This refers to I.E. Inspection 50-247/84-24 conducted by Mr. P. Clemons of your office on August 27-31, 1984 of activities authorized by NRC Licensing No. DPR-26 at Indian Point Unit No. 2. Your October 26, 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: 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 6.11, "Radiation Protection Program" requires that, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure."

- (a) Procedure No. EHS 3.403, "Steam Generator Channel Head Entry", developed pursuant to the above, requires in Section 5.3 that "An SAO-134 will be prepared for the entry of personnel in the Steam Generators". An SAO-134 was prepared for the entry in Steam Generator No. 23 on August 22, 1984, and it required that exposures be recorded for each jumper as the jumper left the Channel Head.

Contrary to the above, on August 22, 1984, a worker, working on Steam Generator No. 23, made four partial and/or full jumps into the generator, and the health physics technician covering the job did not record the workers exposure information after each jump. The technician did not read the worker's special external whole body dosimeters until after the fourth jump, and this result in the worker exceeding his quarterly administrative exposure limit of 1250 millirem. The actual dose received during the jumps was 1350 millirem.

- (b) Procedure No. EHS 2.006, "Dissemination of Information Relative to Environmental Health and Safety Procedures", requires that procedures and procedure changes be reviewed with the Radiation Protection Section personnel. Section 2.1.5 of Procedure No. EH&S 2.006 states, "A required Reading Acknowledgement Form (Addendum 1) denoting the procedure/revision number and title, the Radiation Protection Section individual's name required to read the procedure, his/her initials indicating awareness and understanding of the procedure contents, and verification by a Radiation Protection Supervisor shall be completed for all new procedures or revisions to procedures".

Contrary to the above, as of August 31, 1984, the license did not have a copy of the Reading Acknowledgement Form (EHS 2.006-1, Addendum 1) indicating that the health physics technician covering the Steam Generator job on August 22, 1984, had read and understood the procedure contents of Procedure No. EH&S 3.403, "Steam Generator Channel Head Entry."

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

#### RESPONSE

Con Edison agrees with the description of the events, as stated in the Notice of Violation. In order to preclude recurrence of such events, the following actions have been taken:

1. Establishment of a requirement that HP personnel without previous steam generator work coverage experience receive mockup training in steam generator work coverage, prior to their assignment to this activity. This requirement will be incorporated in EH&S procedure 3.403 by 1/1/85.
2. Retraining of the HP Technician responsible for this violation, including mockup training, and his completion of a Reading Acknowledgement Form for EH&S Procedure 3.403.
3. A review of contractor and company health physics technicians compliance with EHS 2.006 was initiated to establish that a Reading Acknowledgement Form was completed by those individuals for EH&S 3.043. Contractor and health physics technicians who have not completed this form will not be allowed to perform the tasks governed by EH&S 3.403.
4. Appropriate disciplinary action was implemented.