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August 9, 1990

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

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

SUBJECT: Response to SALP Initial Report No. 50-247/89-99

This is in response to the NRC's Systematic Assessment of Licensee Performance (SALP) Initial Report No. 50-247/89-99 (March 1, 1989 - March 31, 1990), dated June 26, 1990. We generally concur with the conclusions drawn therein and are committed to implementation of the recommendations offered.

Con Edison has strived to achieve enhanced performance in many operational and support areas and while improvements are being realized, these efforts must be continued. A few examples of such initiatives that have been undertaken as part of our Consolidated Improvement Program (CIP) include:

- o An Independent Safety Review Group which has been formed as a result of a feasibility assessment by an ad hoc independent review team.
- o A Reactor Coolant System decontamination feasibility review and the completion of several prerequisites for this project.
- o A reorganization and consolidation of the corporate purchasing and site procurement functions at Indian Point under one manager.
- o The development of a comprehensive cable separation walk-down and verification program. The heavy power 480V loads have been walked down and cable routing has been verified to reconstitute the cable separation design basis for the plant.
- o An independent review of the modification files to assure technical adequacy, effectiveness and completeness.

The recommendations proposed in the SALP report will be heeded. We will coordinate with Mr. Curtis Cowgill of Region I to schedule a series of meetings as discussed in those recommendations. Specifically, in the area of Radiological Controls, we intend to have periodic meetings with NRC to discuss improvements to our self-assessment program, improvements to outage planning and coordination, and adherence to radiation worker requirements. Additionally, in the area of Maintenance, we will continue to implement improvements to the maintenance process and we will keep the NRC informed of

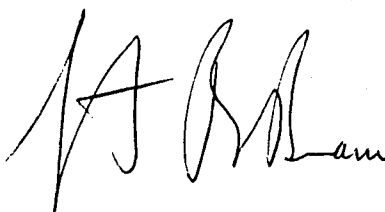
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such improvements through periodic meetings at approximately six month intervals. In the area of Emergency Preparedness, we will schedule a management meeting with NRC to discuss the adequacy of our current EAL scheme as well as recently implemented changes to the emergency plan change review process which emphasize identification of a need for prior NRC review. We look forward to a constructive dialogue with, and feedback from the NRC at these meetings.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. W. Jackson".

cc: Mr. Thomas T. Martin  
Regional Administrator - Region I  
US Nuclear Regulatory Commission  
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Mr. Donald S. Brinkman, Senior Project Manager  
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