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April 6, 2000

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

Subject: Testing of HEPA Filter Systems

This letter is to clarify testing being performed on HEPA Filters in engineered safety systems at Indian Point 2. During a telephone conference call with members of the NRC Staff on March 28, 2000, the NRC Staff pointed out that the existing Technical Specification testing requirements in Section 4.5 contain wording that could be misinterpreted and viewed as conflicting with other specifications. Listed below are the specific items and Con Edison's plans for future testing of these systems. A Technical Specification change will be requested by September 1, 2000 to revise the appropriate wording.

1. Technical Specification 4.5.E.2.b. states "... the total bypass flow of the system to the facility vent, including leakage through the system diverting valves, is less than or equal to 1% when the system is tested by admitting cold DOP at the system intake." The staff's comment was that this language needs to be reconciled with specification 4.5.E.2.c.

This specification addresses the control room filtration system. The wording above is more appropriately applied to other types of systems, as the control room ventilation system does not discharge to the facility vent and does not have diverting valves. Since credit is taken in dose calculations for design basis events of 99% removal of particulate by HEPA filters, testing to a 99.95 standard is appropriate (rather than 99.0), and will be the value used for acceptance testing at Indian Point 2.

ADD 1/1

2. Technical Specification 4.5.E.4.c. does not contain a required flow for conduct of the pressure testing.

As this testing is performed at the same time as other testing with specified flows, a flow of 2000 cfm +/- 10% will be utilized for the pressure testing.

3. Technical Specification 4.5.E.5. states "...that the HEPA filter banks remove greater than or equal to 99% of the DOP...". This specification potentially conflicts with specification 4.5.E.6.

This specification addresses the control room filtration system. Since credit is taken in dose calculations for design basis events of 99% removal of particulate by HEPA filters, testing to a 99.95 standard is appropriate (rather than 99.0), and will be established as the value for acceptance testing at Indian Point 2.

4. Technical Specification 4.5.F.5. states "...verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP...". This specification potentially conflicts with specification 4.5.F.2.b.

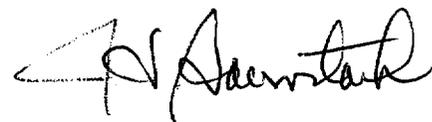
This specification addresses the fuel storage building air filtration system. No credit is taken for removal of particulate by HEPA filters in the fuel handling accident, thus the 99% standard for acceptance testing at Indian Point 2 is appropriate.

5. Technical Specification 4.5.G.4. states "...verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP...". This specification is potentially in conflict with specification 4.5.G.1.b.

This specification addresses the post-accident containment venting system. No specific credit is taken in dose calculations for particulate removal by HEPA filters in this system post accident, thus the 99% standard for acceptance testing is appropriate.

The commitments made by this correspondence are contained in the enclosed list of commitments. Should you or your staff have any questions regarding this letter, please contact Mr. John McCann, Manager, Nuclear Safety and Licensing.

Very truly yours,



Enclosure

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**Con Edison – Indian Point 2
Commitments**

The following list identifies those actions committed to by Con Edison in this document. Any other actions discussed in this submittal represent intended or planned actions by Con Edison. These actions are described to the NRC for the NRC's information and are not regulatory commitments.

| Commitment | Due Date |
|---|---|
| Con Edison will request a Technical Specification revision to Section 4.5 to clarify the requirements for HEPA testing for the Control Room Filtration System. | September 1, 2000 |
| Con Edison will assure that test procedure acceptance criteria for Control Room HEPA testing is 99.95. | May 1, 2000 |
| Following approval of changes to Technical Specification 4.5, which are pending, Con Edison will assure that future Control Room pressure testing is performed with flow at 2000 CFM +/- 10%. | 30 days after approval of Technical Specification changes |