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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: INDIAN POINT UNIT NO. 2 TECHNICAL SPECIFICATION 4.13

Dear Sirs:

Indian Point Unit No. 2 (IP2) Technical Specification Table 4.13-1 requires NRC approval prior to "startup" under circumstances set forth in Technical Specification 4.13, Category C. It is Con Edison's position that for purposes of this Technical Specification, this means exceeding a reactor coolant system (RCS) temperature of 350 degrees Fahrenheit. This hold point is consistent with Technical Specification 3.1.A.2, which requires that two steam generators be capable of performing their heat transfer function whenever the reactor coolant system (RCS) is above 350 degrees Fahrenheit. It is also consistent with Technical Specification 4.3, which includes a requirement to test the RCS for leakage at normal operating pressure prior to plant startup following each refueling outage. Technical Specification Table 4.3-1 allows for testing prior to exceeding an RCS temperature of 350 degrees Fahrenheit.

Should you or your staff have any questions concerning this item, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing (914) 734-5129.

Sincerely,



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cc: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
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