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June 30, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247
NL- 00-74

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: Indian Point Unit No. 2 Pre-Startup Testing

REFERENCE: Con Edison Letter to USNRC Document Control Center dated June 8, 2000, "Indian Point Unit No. 2 Technical Specification 4.13"

The purpose of this letter is to provide additional information regarding planned plant testing activities above a reactor coolant system (RCS) temperature of 200 degrees Fahrenheit while awaiting NRC approval for startup as required by Technical Specification 4.13 as discussed in the referenced letter. In addition to the NRC approval required by Technical Specification 4.13 for heatup above 350 degrees Fahrenheit, approval of the pending Technical Specification Amendment request concerning revision of the source term for IP2 is required for heatup above 200 degrees Fahrenheit.

The current plan is to bring the plant above cold shutdown to conduct several tests. With the reactor coolant system at 340 degrees and 1500 psig, a primary to secondary leakage test will be performed in accordance with EPRI guidelines. This test will be performed by monitoring the presence of Tritium in the secondary coolant. This testing supplements steam generator leakage testing completed earlier in the outage, which was a reverse pressure test when compared to normal operation. The currently proposed testing will provide additional assurance of steam generator structural integrity, and cannot be performed effectively under lower temperature or pressure conditions.

In addition, leakage tests will be conducted on the reactor coolant system isolation valves associated with the residual heat removal and safety injection system check valves that connect to the reactor coolant system. In order to conduct these tests, the reactor coolant system will have to be heated to approximately 340 degrees and pressurized to a

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maximum of 1500 psig. This testing is an important milestone and is required by plant Technical Specifications prior to plant startup.

These activities do not create any additional potential for a radioactive iodine release path compared to present plant conditions for the following reasons:

1. The reactor has been subcritical since 2/15/2000. Radioactive Iodine isotopes are no longer present in significant quantities in the reactor coolant system. In addition, approximately one-third of the reactor fuel has been replaced with new fuel elements that contain no fission products or radiogas.
2. The reactor will be maintained in a subcritical condition. Heating the reactor coolant system to 340 degrees with reactor coolant pump heat does not generate fission products and therefore does not create Iodine.
3. The pressure differential across the steam generator tubes during this testing will be approximately 1400 psid. This is less than the normal operating differential pressure of 1550 - 1600 psid.
4. Containment integrity, in accordance with Technical Specification requirements, will be established prior to exiting the cold shut down condition and will remain in effect throughout the planned testing.
5. Given the current decay heat load of the reactor, the RCS could be expeditiously cooled to less than 200 degrees should the need for this action become apparent.

Approval of the Source Term Technical Specification Amendment request will put the plant in a position to heat the reactor coolant system above 200 degrees and conduct the testing activities described above. The planned heat-up and testing activities will take approximately 4-6 days. Following completion of the planned testing activities the plant will be returned to the cold shut down condition and will remain there until the NRC approval for startup is received.

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

Sincerely,

Robert E. Hazen
for A.A. Blind

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