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September 11, 2000

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL 00-117

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Mail Stop P1-137  
Washington, D. C. 20555-0001

Subject: Response to NRC Request for Additional Information Regarding Generic Letter 99-02, Indian Point Nuclear Generating Unit No. 2 (TAC NO. MA7375)

Reference: Con Edison, Indian Point 2 Station letter to NRC, dated November 22, 1999, "Proposed Technical Specification Amendment on the Laboratory Testing of Nuclear-Grade Activated Charcoal"


This letter provides Consolidated Edison's Company of New York, Inc. (Con Edison) response to the subject request for additional information. A telephone conference between Con Edison and the NRC staff was held on August 22, 2000 to clarify the ventilation systems to which the Generic Letter applied as well as allow a discussion of the open questions.

The information provided by Con Edison in the referenced letter enveloped several ventilation systems, all of which are contained in the Indian Point Unit No. 2 Technical Specifications. However, as stated by the NRC staff during the August 22, 2000 telecon, the intent of the Generic Letter was to provide guidance applicable to those ventilation systems that are relied on to mitigate the consequences of an accident. Attachment 1 to this letter provides our supplemental response and is based on the August 22, 2000 guidance.

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Commitments made by Con Edison in this correspondence are contained in Attachment 2. If you have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety and Licensing at (914) 734 – 5074.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "A. Alan Blair". The signature is written in a cursive, flowing style.

Attachments

cc: Mr. Hubert J. Miller  
Regional Administrator  
US Nuclear Regulatory Commission  
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Mr. Patrick D. Milano, Project manager  
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## ATTACHMENT 1

### RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION GENERIC LETTER 99-02

#### 1. NRC REQUEST:

As requested in Generic Letter (GL) 99-02, provide the following information for: (1) the containment air filtration system (CAFS), (2) the control room air filtration system (CRAFS), (3) the fuel storage building air filtration system (FSBAFS), and (4) the post-accident containment ventilation system (PACVS):

- a. Bed size (i.e., thickness)
- b. Actual face velocity\*
- c. Actual residence time\*
- d. Current Technical Specification (TS) Requirements:
  - (1) Test penetration of MI
  - (2) Safety factor
  - (3) Test standard
  - (4) Test temperature
  - (5) Test relative humidity

\* Describe the method used to calculate the actual face velocity and residence time

#### CON EDISON RESPONSE:

The following information applies to the Control Room Air Filtration System (this is the only ventilation system for which the UFSAR credits a mitigation function and is consistent with the guidance provided by the NRC in the August 22, 2000 telecon):

- a. Bed Size (i.e., thickness) 2 inches (50.8mm)
- b. Actual face velocity\* 0.203 meters/sec. (12.2 meters/min or 40 ft/min.)
- c. Actual Residence time\* 0.25 seconds

\* The Control Room Air Filtration System is equipped with 6, Type II Adsorber Cells as described in ASME AG-1-1991 Section FD. Each cell (per ASME AG-1-1991 Article FD-4210) has a minimum residence time of 0.25 seconds at a rated capacity of 333 cfm (9.43 m<sup>3</sup>/min). The fan unit associated with this system has a capacity of approximately 2000 cfm. Therefore, six cells at 333 cfm each total 1998 cfm.

## ATTACHMENT 1

d. Current TS 4.5.E.2.d requirements:

verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

No further guidance is provided in the TS. These references do provide the basis for testing and result in Con Edison utilizing the following testing parameters:

- |     |                         |                 |
|-----|-------------------------|-----------------|
| (1) | Test penetration of MI: | 98%             |
| (2) | Safety factor:          | 5               |
| (3) | Test standard:          | ASTM D3803-1979 |
| (4) | Test temperature:       | 80° C           |
| (5) | Test relative humidity: | 70%             |

2. NRC REQUEST:

In TS Amendment No. 211 dated July 27, 2000, only the CRAFS charcoal filters are credited in the design-basis accident analysis. Also, the fuel handling accident analysis was calculated without FSBAFS or CRAFS filtration. The PACVS filtration was not credited. Since the charcoal filters in the FSBAFS and PACVS are not credited in the accident analysis, are any changes to the applicable filter testing requirements in the TS planned? In Amendment No. 211, the CAFS filter testing requirements were removed from the TS. Discuss any further changes needed to TS Section 4.5.E and TS Bases page 4.5-10.

CON EDISON RESPONSE:

There are no current plans to change the applicable testing requirements for the FSBAFS and PACVS at this time. Any future changes would be submitted as a separate TS amendment request. The IP2 TS and Bases pages submitted in the reference will be reconciled with those pages of Amendment 211 to remove references to the filter testing of the CAFS. This will occur prior to the issuance of the amendment requested in the reference in accordance with the normal issuance process.

## ATTACHMENT 1

### 3. NRC REQUEST:

In your November 22, 1999, letter, you stated that the charcoal in the ventilation systems required by TS will be tested prior to completion of the calendar year 2000 refueling outage. Provide the current status of this scheduled testing and test standard used.

### CON EDISON RESPONSE:

The carbon in the CRAFS was tested successfully July 1998 to the ASTM D3803-1989 standard at 30°C, 95% relative humidity and 12.2 meters/min. The CRAFS carbon will be tested again prior to re-start from the current outage.

## ATTACHMENT 2

Con Edison, Indian Point Station Unit No. 2 Commitment

Response to NRC Request for Additional Information for GL 99-02

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### Commitment 1:

The IP2 TS and Bases pages submitted in the reference will be reconciled with those pages of Amendment 211 to remove references to the filter testing of the CAFS. This will occur prior to the issuance of the amendment requested in the reference in accordance with the normal issuance process.

### Commitment 2:

The CRAFS carbon will be tested again prior to re-start from the current outage.