

September 25, 2000

Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

SUBJECT: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTION WHILE IN A SHUTDOWN CONDITION," INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 (TAC NO. MA4789)

Dear Mr. Blind:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for Pressurized-Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to draindown the reactor coolant system (RCS) to the refueling water storage tank (RWST) and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2) if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In a letter dated November 24, 1998, Consolidated Edison Company of New York, Inc. (ConEd), provided its response to GL 98-02 for the Indian Point Nuclear Generating Unit No. 2 (IP2). In this letter, ConEd indicated that IP2 was vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with GL 98-02.

On April 13, 2000, the staff issued NRC Inspection Report No. 50-247/2000-001. In this report, the staff provided the details of its on-site verification of activities which ConEd undertook in response to GL 98-02. Specifically, the staff verified that ConEd had effectively implemented administrative controls, configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02. The staff found that motor-operated valve no. 883, "RHR to RWST," is normally closed, sealed and electrically deenergized (caution

tag at motor control center). This valve provides isolation capability for the RHR return line between the discharge of the RHR pumps and the RWST. The RHR return line is used during refueling operations to provide a draindown path from the refueling cavity to the RWST. The inadvertent opening of Valve 883 would direct the RCS water inventory into the common supply from the RWST to the emergency core cooling pumps. The staff reviewed the administrative controls in place to preclude the loss of RCS inventory, including Station Administrative Order (SAO) 136, "Management of Outages," and Station Operating Procedure (SOP) 4.2.1, "Residual Heat Removal System Operation." SAO 136 requires Pre-outage Shutdown Safety Issues Review to evaluate the availability of systems (temporary or installed) to support key shutdown safety functions, and to ensure alternative capability for areas of high risk to key safety functions. SOP 4.2.1 requires the completion of Check Off List 10 which, in part, ensures that Valve 883 is closed and sealed. Therefore, the staff determined that additional corrective measures were not required and that the administrative controls outlined in the station procedures provided reasonable assurance to preclude a draindown event similar to that experienced at Wolf Creek.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for IP2; therefore, we consider GL 98-02 to be closed for IP2.

Sincerely,

/RA/

Patrick D. Milano, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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