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November 7, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-00-135

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

Subject: Response to Request for Additional Information - Generic Letter 97-05,
"Steam Generator Tube Inspection Techniques," for Indian Point Unit
No. 2. (TAC No. MA0468)

Reference: 1) USNRC Letter to Con Edison dated September 8, 2000
2) Con Edison Letter to USNRC dated March 17, 1998
3) Con Edison Letter to USNRC dated October 28, 1998
4) Con Edison Letter to USNRC dated October 1, 1999
5) Con Edison Letter to USNRC dated June 2, 2000

By letters dated March 17 and October 28, 1998, and October 1, 1999, Consolidated Edison Company of New York, Inc., (Con Edison) submitted information in response to NRC requests for additional information (RAI) regarding Generic Letter 97-05. The NRC staff has reviewed the additional information provided and determined that additional information relative to Con Edison's position regarding 1) eddy current methods to size pit indications and 2) criteria for repairing tubes with pit indications with plugs is necessary. Con Edison's response below describes the actions taken during the 1997 and 2000 Original Steam Generator (OSG) inspections and the baseline inspection of Replacement Steam Generators (RSG) that are currently being installed at Indian Point 2.

BACKGROUND

During the 1997 (Refueling Outage 13) steam generator inspection, eddy current methods described in References 2, 3 and 4 were used to estimate the size of all pit indications that were detected. Pit indications less than 28 percent through wall were left in service.

During the 2000 (Refueling Outage 14) steam generator inspection, tubes that contained pits were plugged, regardless of pit size, although Con Edison continued to

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size pits for information only. Details on the inspection results and the number of pit indications are contained in Table 3.5-3 of the Condition Monitoring and Operational Assessment Report section pertaining to degradation mechanisms other than U-bend PWSCC. This report was submitted to the NRC on June 2, 2000.

CURRENT STATUS

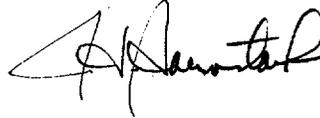
Con Edison is currently replacing the existing Westinghouse Model 44 steam generators with Westinghouse Model 44F steam generators. The new steam generators contain numerous design improvements including the use of Alloy 600 thermally treated tubes. A pre-service inspection (PSI) was performed in 2000 on 100 percent of the tubes in the RSGs. As expected, no pits, cracks or other degradation mechanisms were detected and no tubes were plugged. The next inspection of the RSGs is currently expected to occur in approximately two years.

Con Edison has implemented Station Administrative Order (SAO)-180: "Administrative Steam Generator Program Plan." This document describes in detail Con Edison's program for implementation of NEI 97-06. Accordingly, steam generator tube inspection procedures and equipment are qualified in accordance with industry standards. Methods used to detect and size steam generator tube degradation will be evaluated each cycle and documented in a Degradation Assessment. The Degradation Assessment will also identify plugging criteria. Prior to leaving tubes with identified degradation in service, Con Edison will submit to the NRC the applicable plugging criteria, details of the inspection method, and technical bases.

Commitments made by Con Edison contained in this letter are listed in Attachment 1.

Should you or your staff have any concerns regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McCann", is written over a horizontal line.

Attachment

C: Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I-1
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Attachment 1

Regulatory Commitments / Generic Letter 97-05

The following list identifies those actions committed to by Con Edison in this document. No further regulatory commitments are contained herein.

Commitment	Due Date
Prior to leaving tubes with degradation in service, Con Edison will submit to the NRC the applicable plugging criteria, details of the inspection method, and technical bases.	To be performed as part of the degradation assessment process, if contingency is needed.