A. Alan Blind
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5718
blinda@coned.com

April 19, 2001

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-01-046

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555-0001

Subject: Inservice Testing Program Relief Request for Valves

Reference 1) Con Edison Letter to USNRC dated June 2, 2000, "Inservice Testing (IST) Program Third 10-Year Interval Revision 2 Relief Requests for Pumps and Valves for Indian Point Unit No. 2"

Pursuant to the requirements of 10 CFR 50.55a(a)(3)(ii) and Indian Point Unit 2 Technical Specification 4.2.1, Consolidated Edison Company of New York, Inc. (Con Edison) hereby submits a relief request to the ASME Boiler and Pressure Vessel Code, Section XI test requirements pertaining to exercise testing of check valves. The affected check valves are included within the IST program scope (Reference 1) and have been tested.

No new regulatory commitments are being made by Con Edison in this correspondence.

Should you or your staff have any concerns regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing at (914) 734-5074.

Sincerely,

A. Alan Blind

Attachment

A047

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, Section 1
Project Directorate I
Division of Licensing Project Management
US Nuclear Regulatory Commission
Mail Stop O-8-C2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

RELIEF REQUEST BASIS

SYSTEM:

AFW/GAS

VALVES:

CT-714, CT-715 (AFW)
CD-631, CD-632 (GAS)

FUNCTION:

The check valves open to allow nitrogen (N_2) to enter the Condensate Storage Tank (CST). Check valve CD-631 is paired with CD-632 and supplies N_2 to the 8"CST fill line. Valve CT-714 is paired with CT-715 and supplies N_2 to the 2"CST drain line. The two separate locations for supplying nitrogen were selected to obtain a good distribution of nitrogen in the CST. The nitrogen is used to purge air from the tank for the purpose of controlling steam generator chemistry.

The valves must close to prevent the CST from draining should there be any loss of nitrogen system integrity. There are no test connections between the valves allowing individual testing.

TEST REQUIREMENT:

OM--10, Para. 4.3.2 (Exercise)

BASIS FOR RELIEF:

Each pair of check valves (CT-714/CT-715 and CD-631/CD-632) is in a nitrogen supply line to the CST. In each case, only one check valve is required to meet the safety class boundary requirements of Regulatory Guide 1.26, Footnote 4. The installation of two check valves provides additional reliability but is not required to meet safety class interface criterion. Closure of one of the valves in each pair is adequate to prevent gross leakage from the CST in the event of a loss of nitrogen system integrity. No individual or combined valve leakage limit is required to meet the system design basis. Both sets of valves are included in the IST Program. These check valves are not provided with intermediate test connections or other indicators that would allow verification that the disks move to the closed position promptly upon cessation or reversal of flow. Removing the associated lines from service during normal operation could adversely affect the chemistry in the CST. Valve closure can be verified during cold shutdown when nitrogen can be isolated from the CST and the N_2 system can be opened and vented.

ALTERNATIVE TESTING:

Each pair of series check valves will be exercised in the reverse direction by positive means at cold shutdown frequency to verify the closure capability of at least one of the valves. Both valves in each tested pair will be considered inoperable if the testing indicates that the valves do not close on reverse flow.

REFERENCE:

NUREG-1482, Section 4.1.1