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July 3, 2001

Re: Indian Point Unit Nos.1 and 2  
Docket Nos. 50-003 and 50-247  
NL- 01-088

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station 0-P1-17  
WASHINGTON, DC 20555-0001

Subject: Periodic Summary Report of NRC Regulatory Commitment  
Changes at Indian Point 1 and 2

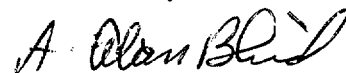
- Reference: 1. NEI 99-04 Revision 0, "Guidelines for Managing NRC  
Commitment Changes"
2. NRC Regulatory Issue Summary 2000-17 Managing Regulatory  
Commitments Made by Power Reactor Licensees to the NRC Staff

In accordance with NEI 99-04 Rev. 0 as addressed in NRC Regulatory Issue  
Summary 2000-17 guidelines, the attached is Con Edison's periodic summary  
report of changes to regulatory commitments. One commitment was revised,  
effective 1/28/00, during the last refueling cycle. Guidance in Revision 0 of the  
Nuclear Energy Institute "Guidelines for Managing NRC Commitment Changes"  
(NEI 99-04) was utilized in preparing the attachment.

The commitment change made by Con Edison is in Attachment 1 to this letter.

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

Sincerely,



cc: Next page  
Attachments

A001

Attachments

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ATTACHMENT TO NL-01-088

Periodic Summary Report for Changes to Regulatory Commitments

## ATTACHMENT 1

### **COMMITMENT 2000-03**

The original commitment was associated with the response to GL 89-13, Service Water System Problems Affecting Safety Related Equipment, Required Action III. The response stated "we have a QA radiographic plan in place, which randomly inspects 10% of the service water piping welds annually."

### **REVISION/JUSTIFICATION**

The revised commitment now states: "We have a radiography plan in place. This plan provides an approach for examining critical welds that have been previously identified as having erosion in the past as well as examining non suspect welds and previously accepted welds. The radiographic inspections/examinations of the service water piping welds take place during refueling outages."

The justification for change is: Due to the operating cycle of the unit, we perform a radiographic exam of piping on a refueling interval, not an annual cycle. The exam is also more sophisticated than a random 10% of welds. For example, the exam for 10 inch piping inside containment is as follows: 20% of welds that have shown moderate scalloping, 5% of the welds that have shown scalloping, 1% of welds that have minor scalloping and 1% of previously accepted or repaired welds. For other service water piping, a similar graded approach is used. This approach has been set to ensure that the areas most prone to problems are inspected more frequently than those which are not problematic. The specifics of the radiographic inspections are contained in the Indian Point Unit 2 Service Water Piping Inspection Program.