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July 31, 2001

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-01-099

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station O-P1-17
Washington, DC 20555-0001

Subject: Inservice Testing Program Relief Requests

Consolidated Edison Company of New York, Inc. (Con Edison) hereby submits three (3) one-time only relief requests to the inservice test requirements of the ASME Boiler and Pressure Vessel Code Section XI. A general valve relief request (# 43) for valve position verification, a specific relief request (# 44) for valve 846 leakage rate testing, and a specific pump relief request (# 5) for Recirculation Pumps 21 and 22 are attached. These relief requests are submitted pursuant to the requirements of 10 CFR 50.55a(f)(5)(iii) and 50.55a(a)(3). Indian Point Unit No. 2 Technical Specifications Section 4.2.1 requires inservice testing for those pumps and valves required for safety, except where specific written relief has been granted.

Without approval of the subject relief requests, a cold shutdown outage during the second quarter of 2002 would be necessary to perform the required testing. Compliance with the specific Code requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. If the relief requests are granted, the underlying tests would be performed during the next refueling outage, which is intended to commence no later that November 19, 2002.

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

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

Sincerely,

A. Alan Blind

Attachments

A047

C: Mr. Hubert J. Miller
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RELIEF REQUEST BASIS

SYSTEM:

SIS

VALVES:

846

FUNCTION:

Valve 846 is a normally locked open gate valve which provides a flow path from the Refueling Water Storage Tank (RWST) to the Residual Heat Removal (RHR) pumps, and Safety Injection System (SIS) pumps. This valve must remain open during the safety injection phase of a design basis accident. The valve is repositioned closed to enable realignment to high head recirculation path following loss of the normal low to high head path. In this mode of operation, this valve must close to prevent contaminating the RWST with potentially highly radioactive water from the containment sump.

TEST REQUIREMENT:

OM-10, Para. 4.2.2.3-Leakage Rate for Other Than Containment Isolation Valves, Subparagraph (a)-*Frequency*-Tests shall be conducted at least once every two years.

BASIS FOR RELIEF:

Relief is requested from the ASME OM-10, Para. 4.2.2.3 (a) requirement to conduct a leakage rate test at least once every two years. The test was last performed during May 2000 while the plant was shutdown for a refueling outage. The twenty-four (24) month time interval for testing the valve will expire prior to the next refueling outage scheduled for November 2002. The testing of this valve requires the plant to be in cold shutdown or refueling and the previous tests have been performed during either extended shutdowns or refueling outages. During the conduct of the test, the ability to add water to the Reactor Coolant System (RCS) via the SIS, RHR or Chemical and Volume Control System will be disabled.

This relief request seeks an extension for the leak testing of valve 846, currently scheduled to be conducted in May 2002. An extension not to exceed seven (7) months is requested to allow the tests to be performed at the next scheduled refueling outage, which is expected to commence no later than November 19, 2002.

The requested extension provides an acceptable level of quality and safety. The subject valve is normally locked open and not disturbed from the open position except for closure testing. The valve is not subject to constant wear or harsh environmental conditions and remains in one position during the period between tests. Thus, the period of time between tests will not impact the leak tightness of the valve and the level of quality and safety would not be significantly impacted.

Strict compliance with the ASME OM-10 requirement would result in hardship and unwarranted cost without a compensating increase in the level of quality and safety. A plant shutdown solely for the purpose of performing the leak test would unnecessarily challenge safety-related equipment and could create hazards that could be avoided until the next scheduled refueling outage

ALTERNATIVE TESTING:

The valve seat leakage test will be performed during the 2002 refueling outage, which is expected to commence no later than November 19, 2002. Relief request expires at the end of the 2002 refueling outage.

RELIEF REQUEST BASIS

SYSTEM:

Various

VALVES:

Various, those valves which are Stroke Tested during Plant Shutdown

FUNCTION:

Various

TEST REQUIREMENT:

OM-10, Para. 4.1-Valve Position Verification-Valves with remote position indicators shall be locally observed at least once every 2 years to verify that the valve operation is accurately indicated.

BASIS FOR RELIEF:

Relief is requested from the ASME OM-10, Para. 4.1 requirement to observe locally, at least once every 2 years, that valve operation is accurately indicated. This relief request proposes an extension for those valves which are subject to valve position verification between September 2002 and November 2002. An extension not to exceed three months is requested in order to allow these tests to be performed at the next refueling outage, which is expected to commence no later than November 19, 2002. This relief request is applicable to those valves where stroke testing may only be performed during plant shutdown.

The proposed extension provides an acceptable level of quality and safety. The subject valves are generally undisturbed at their normal positions except, while stroke testing during plant shutdown conditions. The valves are not subject to constant wear or harsh environmental conditions and remain idle during the majority of the period between tests. Thus, the period of time between tests does not impact valve position indication and the level of quality and safety would not be significantly impacted.

Strict compliance with the ASME OM-10 requirement would result in hardship and unwarranted cost without a compensating increase in the level of quality and safety. A plant shutdown solely for the purpose of performing the valve cycling required for valve position verification would unnecessarily challenge safety-related equipment and could create hazards that could be avoided until the next scheduled refueling outage. Furthermore, the need to keep personnel radiation exposure as low as reasonably achievable (ALARA) presents additional justification for the proposed relief request extension.

ALTERNATIVE TESTING:

The valves will have their position indication verified during the 2002 refueling outage, which is expected to commence no later than November 19, 2002. Relief request expires at the end of the 2002 refueling outage.

RELIEF REQUEST BASIS

SYSTEM:

SIS

PUMPS:

Recirculation Pumps 21 and 22

FUNCTION:

The function of the Recirculation Pumps are to pump borated water from the Recirculation Sump to the Reactor Coolant System during the post accident recirculation phase following a design basis accident.

Additionally, the pumps provide recirculation of borated water from the Recirculation Sump to the Safety Injection Pumps during high head recirculation.

TEST REQUIREMENT:

OM-6, Para. 5.5-Pumps Lacking Required Fluid-Pumps lacking fluid inventory shall be tested at least once every two years.

BASIS FOR RELIEF:

Relief is requested from the ASME OM-6, Para. 5.5 requirement for the purpose of extending the test performance date until the next refueling outage, which is expected to commence no later than November 19, 2002. This relief request would result in an extension of approximately six months (May 30, 2002 to November 19, 2002).

The proposed extension provides an acceptable level of quality and safety. The recirculation pumps are located in containment and are part of a normally dry sump system. The pumps are not subject to constant wear or harsh environmental conditions and remain idle during the entire period between tests. Thus, the period of time between tests does not impact pump performance and the level of quality and safety will remain the same.

Strict compliance with the test frequency requirement would result in a hardship and unwarranted cost without a compensating increase in the level of quality and safety. A plant shutdown solely for the purpose of performing this test would unnecessarily challenge safety-related equipment and could create hazards that could be avoided until the next scheduled refueling outage. Furthermore, the need to keep personnel radiation exposure as low as reasonably achievable (ALARA) presents additional justification for the proposed relief request extension.

ALTERNATIVE TESTING:

The recirculation pumps will be tested during the 2002 refueling outage, which is expected to commence no later than November 19, 2002. Relief request expires at the end of the 2002 refueling outage.