September 5, 2001

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING STEAM

GENERATOR SURVEILLANCE REQUIREMENTS, INDIAN POINT NUCLEAR

GENERATING UNIT NO. 2 (TAC NO. MB0770)

Dear Mr. Blind:

In a letter dated December 11, 2000, Consolidated Edison Company of New York, Inc. (Con Edison) submitted a proposed amendment to revise the Technical Specifications (TSs) associated with the primary to secondary leakage limits and the steam generator tube inservice surveillance requirements at Indian Point Nuclear Generating Unit No. 2 (IP2). The TS changes support the inspection and operation of the steam generators that were replaced before restart in December 2000.

The NRC staff has reviewed the information the licensee provided and determined that additional information is required in order to complete its review. The specific information that is needed is in the enclosed request for additional information. In a telephone conversation with representatives of your staff on August 24, 2000, the Nuclear Regulatory Commission (NRC) obtained agreement that Con Edison would provide the additional information requested within 60 days from the date of this letter.

If you have any questions regarding this matter, please contact me at (301) 415-1457.

Sincerely,

/RA/

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

Docket No. 50-247

Enclosure: Request for Additional Information

cc w/encl: See next page

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*See previous concurrence

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Request for Additional Information

Regarding Proposed Amendment to Technical Specifications

on Steam Generator Inspection Requirements

Consolidated Edison Company of New York, Inc.

Indian Point Nuclear Generating Unit No. 2

Docket No. 50-247

In a letter dated December 11, 2000, the licensee requested changes to the Technical Specifications (TSs) associated with the primary to secondary leakage limits and the steam generator tube inservice surveillance requirements. Specifically, the licensee has proposed changes that would lower the primary to secondary leakage limit and remove the provisions that do not apply to the replacement steam generators such as tube repair by sleeving, steam generator tube denting, and the F* alternate repair criteria. The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed TS changes. In order for the staff to complete its review, the staff requires the following information:

- 1. The Basis section of TS 4.13 states that steam generator tube burst and collapse tests demonstrated that tubes having wall thickness of not less than 0.025 inch have adequate margins of safety. In the December 11 letter, the licensee did not indicate what guidelines, if any, were used to obtain these results. Provide a summary of the analysis, including the loads considered, tube support plate conditions (locked or unlocked), and a list of any guidelines (e.g., NRC Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes"), used to support the proposed minimum wall thickness and plugging criteria.
- 2. The Basis section of TS 4.13 states that an essentially 100% tube examination was performed on each tube in each steam generator prior to service. Although the licensee indicated in the December 11 letter that no baseline imperfections were identified, it did not state what guidelines, if any, were used to conclude that the tubes were free of imperfections. In addition, the licensee did not indicate what guidelines would be used for the first inservice inspection (ISI). Provide a reference to the guidelines used for the preservice inspection and the first ISI. If the licensee intends to depart from any part of the guidelines, provide a summary of those differences.
- 3. Provide a summary of the assessment completed to confirm that the issues covered by NRC Bulletin 88-02, "Rapidly Propagating Fatigue Cracks in Steam Generator Tubes," are not applicable to the replacement steam generators.