

Docket No. 50-247

February 25, 1972

Consolidated Edison Company of New York, Inc.  
ATTN: Mr. William J. Cahill, Jr.  
Vice President  
4 Irving Place  
New York, New York 10001

Gentlemen:

This is in response to your letters dated October 8, 1971 and February 7, 1972 concerning design changes to Indian Point Unit 2 and the corresponding changes to the Final Facility Description and Safety Analysis Report (FFDSAR) required to properly reflect these changes.

We have reviewed each one of the twelve items in the October 8, 1971 letter and conclude that they are acceptable as itemized below:

Change No. 1 involves the addition of a check valve to each of four injection lines of the high pressure safety injection system. This design change was made to permit plant operation with the motor-operated stop valves in the open position and is acceptable.

Change No. 2 provides for additional instrumentation to monitor radioactivity in the containment and is acceptable.

Change No. 3 provides for the use of air piston operators with separate accumulator air supply in place of spring returns for the isolation valve operators in the containment ventilation supply and exhaust ducts. We consider this change to be equivalent design and acceptable.

Change No. 4 involves actual opening and closing times of specifically identified valves in the high pressure safety injection system. On the basis that the performance of the system during the steam line break accident or other accident is essentially unaffected; we conclude that this change is acceptable.

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that there is reasonable assurance that the health and safety  
of the public will not be endangered.

Sincerely,

Original Signed By  
R. C. DeYoung

R. C. DeYoung, Assistant Director  
for Pressurized Water Reactors  
Division of Reactor Licensing

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For Change No. 12 we concur with your proposed deletion of the statement on page 11.2-19 of the FFDSAR which defines a specific limit for tritium activity in the reactor coolant. Technical Specification 3.9 "Effluent Release" adequately addresses the limitations on tritium in plant effluents and no specific limit is required for the reactor coolant system.

We have reviewed the proposed piping modifications to the High-Head Safety Injection System in the enclosure to your letter dated February 7, 1972. The present system incorporates injection at two cold legs (loops 2 and 4) and two hot legs (loops 1 and 3). The modification involves a change of the two hot leg injection points to the cold legs so that operation of the high head safety injection system would deliver water to all four cold legs. The modification also includes the addition of two hot leg injection lines which would normally be valved closed but could be used by the operator during the long term recirculation phase of recovery from a loss-of-coolant accident.

The modification does not affect previously reviewed accident analyses for which the high head safety injection system performs a significant function. That is the analyses for the loss-of-coolant accident, the steam line break accident, and the steam generator tube rupture accident as presented in the FFDSAR and the hearing testimony are unaffected.

The modification will be performed in accordance with codes and standards specified in the FFDSAR for the Safety Injection System. The suggested change to the proposed Technical Specifications stated in your enclosure provides for normally open valves at those injection points in the cold legs and normally closed valves at the hot leg injection points.

We conclude that all of the proposed changes addressed above are acceptable and do not present an unreviewed safety question and

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Change No. 5 involves removal of the drain line to the bottom of the spent fuel storage pool to prevent inadvertent draining of the pool and is acceptable.

Change No. 6 involves the removal of the accumulators associated with the charging pumps and is acceptable in light of satisfactory operation of the charging system without significant vibration at Indian Point Unit 2 and other operating plants.

Change No. 7 involving the use of a perforated plate in the bottom nozzle of the fuel assembly is acceptable as equivalent design for which experience on operating plants has been obtained.

Change No. 8 is the substitution of a Plutonium-Beryllium neutron source in place of a Polonium-Beryllium neutron source which is considered to be equivalent design and is acceptable.

For Change No. 9 we concur that the substitution of a containment recirculation sump level indicating device in place of an audible alarm on sump high level is an improvement and is acceptable.

For Change No. 10 we conclude that a separate monitor train in the plant vent will satisfy the requirement to detect gaseous radioactivity exhausted from the residual heat removal pump compartments in lieu of individual compartment radiation detectors.

For Change No. 11 we agree that the sentence referenced on page 8.2-4 of the PFSDAR changed to read that the other diesel generator set is connected to bus 2A and/or 3A correctly reflects the content of drawings and text in other portions of the PFSDAR and is acceptable.

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