



STATE OF NEW YORK  
 ENERGY OFFICE  
 SWAN STREET BUILDING  
 CORE 1 - 2ND FLOOR  
 EMPIRE STATE PLAZA  
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January 13, 1977

Mr. Benard C. Rusche  
 Director, Office of Nuclear Reactor Regulation  
 U.S. Nuclear Regulatory Commission  
 Washington, D. C. 20555

Consolidated Edison Co. of New York Inc.  
 (Indian Point Unit No.2), Docket No. 50-247

Dear Mr. Rusche:

On December 9, 1976 Consolidated Edison transmitted to you an application for an amendment to its operating license for Indian Point Unit No. 2. This amendment would add a new section 4.13 to the Technical Specifications specifying surveillance requirements for the steam generator tube inservice inspection program.

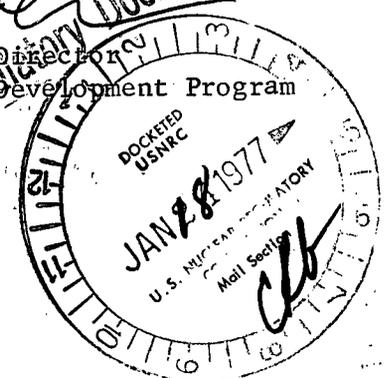
Based on our review of the proposed amendment it is concluded that the proposal contains significant variations from Regulatory Guide 1.83 Revision 1. These variations would all tend to reduce the effectiveness of the proposed surveillance program and an adequate justification for these deviations has not been presented. It is requested that the NRC require that the proposed Technical Specifications be revised to incorporate the attached specific comments.

Sincerely,

*T. K. DeBoer*  
 T. K. DeBoer, Director  
 Technological Development Program

Attach  
 TKD:mfh

*Regulatory Docket File*



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NEW YORK STATE COMMENTS ON  
Consolidated Edison's Proposed Amendments to  
Technical Specifications for Steam Generator Tube  
Inservice Inspection Program for Indian Point Unit 2  
Dated December 9, 1976

1. Section A. 3. C-Change to read: "Every inspection subsequent---."

The inspection of nonplugged tubes which previously had detectable well penetration should not be limited to the first sample inspection subsequent to the preservice inspection. This also applies to areas where experience has indicated potential problems.

2. Section A. 3. D-Delete this entire section

Regulatory Guide 1.83 Revision 1 states that "For U-bend designs, entry for the hot leg side with examination from the point of entry completely around the U-bend to the top support of the cold leg is considered sufficient to constitute a tube inspection." Since Section A.3.D requires the inspection of only those portions of the tubes where previous tube imperfections had been noted and in the area of the tube sheet array, it does not meet the intent of the Regulatory Guide and is significantly less conservative. Abnormalities such as those associated with the recently discovered tube denting and hourglassing phenomena in other areas of the tube may not be found with the proposed limited inspection.

3. Table 4.13-1 - This table is inadequate and should be revised to incorporate the following concerns.

- a. - Regulatory Guide 1.83 Revision 1 requires that the NRC be notified and approve remedial action if more than three tubes exceed the plugging limit. Contrary to this requirement, there are many combinations possible in this table in which from 4 to over 100 tubes could be plugged and the unit returned to power with no requirement to notify the NRC. This table also indicates that most corrective actions (i.e. tube plugging) would be accomplished prior to NRC notification.
- b. - According to the table, if a C-3 condition is observed on the first sample inspection, the second sample inspection will include an inspection of all tubes in the affected steam generator and the plugging of all defective tubes. However, the results of this complete inspection of the affected steam generator do not appear to be utilized in the table for determining what further actions, if any, are required for either this or the other steam generators.

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