William J. Cahill, Jr.
Vice President

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August 28, 1974

Regulatory Docket File

Re Indian Point Unit No. 2
AEC Docket No. 50-247

Mr. Karl R. Goller
Assistant Director for
Operating Reactors
Directorate of Licensing
U. S. Atomic Energy Commission
Washington D. C. 20545

Dear Mr. Goller

Since Con Edison received Mr. DeYoung's letter of November 8, 1973 we have discussed the problem of hydraulic snubber inspection and seal replacement with the Regulatory Staff on several occasions. The program we developed to accomplish these inspections and replacements is still proceeding more rapidly than was originally anticipated. To date, 247 of the 362 snubber assemblies located inside containment have been refurbished with new seal material and an additional 29 snubbers have acceptable seal material. This leaves a total of only 86 snubber seals of the millable gum type that are still to be replaced. During the past inspections, only a small number of snubbers have shown indications of oil leakage. These snubbers were promptly refilled with oil and the seals replaced where necessary. As a result of these inspections, progressive maintenance actions and the replacement program, we have confidence that the installed hydraulic snubbers are being maintained in a condition that will assure that they will adequately perform their intended function if required to do so.

The next 30-day inspection date for the Indian Point Unit No. 2 snubbers is September 3, 1974 at which time a plant outage will be required for the inspection. That day is a Tuesday and Con Edison's peak system load can occur on any weekday between June 15 and September 15. Because of this possibility, it is important to maintain maximum availability of generating facilities during this period of time. We therefore request a 4-day extension of the next inspection for Unit No. 2 until September 7, 1974 to allow the scheduling of the unit outage in a way which does not diminish system reliability. Based on past inspection records such a short delay in inspection of these snubbers will not affect the safety of the facility.

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We would also like to request that the requirements of the Directorate of Licensing letter dated November 8, 1973, specifying a 30-day inspection interval for snubbers with millable gum seals, be supplemented with an allowance of plus or minus seven days to permit scheduling of plant outages at other than peak load periods for the inspections.

Once Con Edison's peak period has passed, units are removed from service for routine maintenance to the extent permitted by system needs. Accordingly, it is still important to avoid unnecessary mid-week outages in order to complete the maintenance program. The requested change would avoid the necessity for almost monthly requests for relief and would not affect the safety of the facility.

Very truly yours

William J. Cahill, Jr.

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