

Carl L. Newman  
Vice President

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April 14, 1976

Re Indian Point Unit No. 2  
Docket No. 50-247  
Facility Operating License  
No. DPR-26

**Regulatory Docket File**

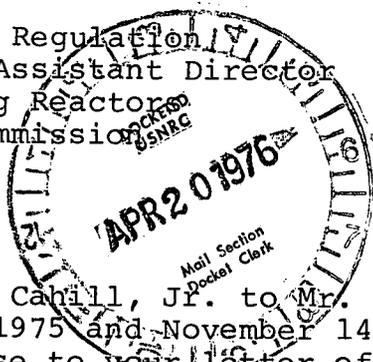
Director of Nuclear Reactor Regulation  
Attn: Mr. Karl R. Goller, Assistant Director  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Gentlemen

Letters from Mr. William J. Cahill, Jr. to Mr. Karl R. Goller, dated September 9, 1975 and November 14, 1975 provided our initial response to your letter of August 7, 1975 concerning compliance with the requirements of 10CFR50, Appendix J, for containment leak testing. This submittal will complete our response in this matter.

In our earlier letters, it was stated that changes to the Indian Point Unit No. 2 Technical Specifications would be required in order to attain full conformance with Appendix J. Accordingly, a proposed amendment to the operating license, dated April 14, 1976, is being filed with the Commission under separate cover. The proposed Technical Specification changes contained therein have been modeled after the appropriate sections of the recently approved Indian Point Unit No. 3 Technical Specifications.

As is the case for Indian Point Unit No. 3, there are several Indian Point Unit No. 2 valves, that are designated as containment isolation valves, for which a Type C test, as required by Appendix J, would serve no particular purpose. Attachment A presents a listing of these particular valves, their functions and a discussion of the characteristics of the systems in which they are located that demonstrate the acceptability of excluding the valves from Type C testing. Consequently, these valves have not been included in



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Mr. Karl R. Goller  
Nuclear Regulatory Comm.

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Table 4.4-1 of the proposed Indian Point Unit No. 2 Technical Specifications which identifies those containment isolation valves requiring Type C testing every refueling.

Very truly yours



Carl L. Newman  
Vice President

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ATTACHMENT A

Containment Isolation Valves that are to be excluded from testing as per Appendix J 10 CFR 50. - Indian Point 2

<u>Valve</u>	<u>Function</u>	<u>Discussion</u>
753 H 753 G	Component Cooling Water For Recircu- lation Pump Motors. (Supply & Return Lines)	During both the normal plant oper- ation and post-accident condition, these manually operated isolation valves are in the open position to provide component cooling water to the Recirculation pumps located within containment. The portion of the component cooling system within containment is a closed system and that portion of the CCS outside containment supplying cooling water to these pumps is also a closed system and monitored for radioactivity. As these two valves are open and in use during plant operation and the post-accident condition and as this cooling system is a closed and monitored water sealed system both inside and outside containment, a Type C test, as re- quired by Appendix J, would serve no particular purpose.

<u>Valve</u>	<u>Function</u>	<u>Discussion</u>
822A 822B	Component Cooling Water for Residual Heat Exchangers (Return Lines)	These isolation valves are closed during plant operation and open during accident conditions (MOV 822 A & B receive an open signal). The portion of the CCS piping inside containment is a closed system and that portion of the component cooling system outside containment supplying cooling water to the residual heat exchangers is also a closed system and monitored for radioactivity. As these two valves are open and in use during the post-accident condition, and as this cooling system is a closed and monitored water sealed system both inside and outside containment, a Type C test, as required by Appendix J would serve no particular purpose.

<u>Valve</u>	<u>Function</u>	<u>Discussion</u>
PCV-1111 PCV-1111 (Two Valves; one in each pene- tration line)	Air Supply to the Weld Channel and Penetration Pres- sure System	During plant operation, as well as post-accident conditions, these isolation valves are required to be in open position to assure continuous pressurization of the Weld Channel and Penetration Pressurization System. The WCPPS within containment is considered the closed system. As the supply air to valves PCV-1111 is always higher than peak accident pressure within containment, no potential exists for leakage from the contain- ment through these valves. Therefore, a Type C test for valves PCV-1111 would serve no purpose.