William J. Cahill, Jr.
Vice President

Consolidated Edison Company of New York, Inc.
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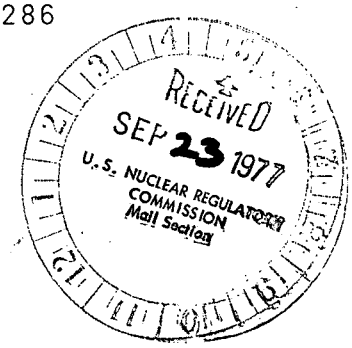
Telephone (212) 460-3819

September 20, 1977

Re: Indian Point Unit Nos. 2 and 3
Docket Nos. 50-247 and 50-286



Director of Nuclear Reactor Regulation
ATTN: Mr. Robert W. Reid, Chief
Operating Reactors Branch # 4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Reid:

By letter dated July 1, 1977, you requested Con Edison to determine if throttle valves are used to obtain required flow distribution in the High Pressure and Low Pressure Safety Injection Systems (HPSI and LPSI) of Indian Point Unit Nos. 2 and 3. In addition, your letter requested that if throttle valves are used, proposed changes to the technical specifications should be submitted to incorporate the surveillance requirements set forth in the enclosure to your letter. The purpose of these surveillance requirements, as stated in the bases of the sample specifications, is to provide assurance that proper Emergency Core Cooling System (ECCS) flows will be maintained in the event of a loss-of-coolant accident (LOCA).

With respect to these two systems the following information is provided.

HPSI SYSTEM

"Throttle" valves are not used in this system for Indian Point Units 2 and 3. Flow distribution/balancing is accomplished by means of electro/mechanical stops on the 856 series valves for Unit No. 2, and a combination of fixed orifices and electro/mechanical stops on the 856 series valves for Unit No. 3.

Section 4.5 of the technical specifications for both units includes surveillance requirements for these valve positions and for system flow testing. It is our determination that the present technical specification surveillance requirements meet the intent of your letter for these valves by providing assurance that proper ECCS flows will be maintained in the event of a LOCA and therefore changes to the technical specifications are not necessary.

LPSI SYSTEM

Two throttle valves (HCV-638 and HCV-640, immediately downstream of the RHR Heat Exchangers), which are not automatic control but remote manual, are used in this system for Indian Point Units 2 and 3. The purpose of these valves is to permit the operator to adjust/balance flows during the long term post-LOCA recirculation phase based upon flow readings in each distribution line. The emergency procedures for both plants require, for long term low head recirculation, that vales HCV-638 and HCV-640 be adjusted such that the total re-circulation flow is limited to no more than 3000 GPM per recirculation pump to avoid long term operation at or near cavitation conditions. Many variables such as break location and size will affect the flow distribution and thus the necessary valve positions. Accordingly, pre-specified valve positions and surveillance requirements on such valve positions are inappropriate for these valves.

Should you or your staff have any further questions, we would be pleased to discuss them with you at your convenience.

Very truly yours,

William J. Cahill, Jr.

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Vice President

copy to: Mr. George T. Berry
General Manager and Chief Engineer
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