Peter Zarakas
Vice President

CENTRAL FILES

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-3000

July 7, 1980

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

Mr. Boyce H. Grier, Director
Office of Inspection & Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Grier:

The response to IE Bulletin 80-11 forwarded by your May 8, 1980 letter is contained in the Attachment A to this letter.

This information is being provided pursuant to 10 CFR 50.54(f). Should you or your staff have any questions regarding this matter, please contact us.

Very truly yours,

Peter Zarakas
Vice President

Subscribed and sworn to
before me this 7th day
of July, 1980.

Angela Roberti
Notary Public
ANGELA ROBERTI
Notary Public, State of New York
No. 41-8593813
Qualified in Queens County
Commission Expires March 30, 1982

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attach.
cc: U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, D. C. 20555

Mr. T. Rebelowski, Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, N. Y. 10511

ATTACHMENT A
Indian Point Unit 2
Response to IE Bulletin No. 80-11

1. Identify all masonry walls in your facility which are in proximity to or have attachments from safety-related piping or equipment such that wall failure could affect a safety-related system. Describe the systems and equipment, both safety and non-safety-related, associated with these masonry walls. Incude in your review, masonry walls that are intended to resist impact or pressurization loads, such as missiles, pipe whip, pipe break, jet impingment, or tornado, and fire or water barriers, or sheild walls. Equipment to be considered as attachments or in proximity to the walls shall include, but is not limited to, pumps, valves, motors, heat exchangers, cable trays, cable/conduit, HVAC ductwork, and elecirical cabinets, instrumentation and controls. Plant surveys, if nenessary, for areas inaccessible during normal plant operation shall be performed at the earliest opportunity.

Response

Many of the masonry walls in the plant consist of removable panels surrounded by reinforced concrete. The masonry walls within the Primary Auxiliary Building are removable radiation shield walls to permit equipment removal from various compartments. All other masonry walls serve as either closures and/or fire barriers and carry no structural loads except for insignificant piping loads.

Masonry walls or panels which are in proximity to or have attachments from safety-related piping or equipment such that wall failure could affect a safety-related system were identified by plant survey in the following buildings:

1. Fan House.
2. Primary Auxiliary Bldg.
3. Fuel Storage Bldg.
4. Control Bldg.
5. Boric Acid Bldg.

All electrical related items such as motors, cable trays, cable/conduit, electrical cabinets etc have not been addressed in the initial field survey of masonry walls. However, it is expected that this portion of the survey will be completed by September 15, 1980 for your review.

The following list identifies the systems and equipment associated with these masonry walls:

Fan House

1) Hydrogen Recombiner Piping
2) Oxygen Stand #21
3) Hydrogen Stand #21
4) Building Heating System
5) Main Ventilation System for Containment, Primary Auxiliary and Fuel Service Buildings

Primary Auxiliary Bldg

A. Boric Acid Evaporator Package Area

1) 6" Component cooling piping - Line #168 with valve Nos. 821B, 823B & 826A & associated instrumentation.
2) 6" Steam supply to Evaporator

B. Concentrate Holding Tank Cell

1) Line #140 with pressure relief valve #263
2) Line #17 - RCP Seal Leak Off Line
3) Line #375 Reactor Coolant Sample Line
4) Line #218 from charging pumps

C. Volume Control Tank Cell

1) Line #140 - Let Down from RCS
2) Line #120 - To Volume Control Tank
3) Line #104 - Concentrate to Hold-up Tank

D. Waste Evaporator Cell

1) Component Cooling Piping for Waste Evaporator-Lines 167, 168, 453, 454

E. Waste Gas Compressor Cell

1) Component Cooling Water from Waste Gas Compressors, Line 452, 453, Relief Valve 821D, Valves 813E, 813F, Flow Indicator FI 668.
2) Waste Gas Compressors #22 and associated piping.

F. Charging Pump Cells

1) Ventilation exhuast ductwork (outside cells)
2) Charging pumps & associated piping (inside cells)

G. RHR Pump 22 Cell & Valve Cell

1) Component Cooling Lines to RHR Pump-Lines #5, 335 & 336.
2) Component Cooling Pump No. 22
3) RHR Valves 739A, 739B, 735A, 735B

Fuel Storage Bldg

1) Component cooling water return - Line #325
2) Spent fuel pit heat exchanger
3) Component cooling 1" relief line with relief valve #802
4) Component Cooling Line from Spent Fuel filter 3" Line #127
5) Building Heating (Steam)

Control Bldg

1) Instrument Air Compressors, Dryers & Associated Piping
2) 2" & 3" Instrument Air Headers
3) Service water and cooling water piping and Heat Exchangers Nos. 21 & 22
4) Deluge Valve Station Room - (Fire Protection System)
5) Fire Protection water and instrument air piping.

Boric Acid Building

1) Fire Protection Piping

2. Provide a re-evaluation of the design adequacy of the walls identified in Item 1 above to determine whether the masonry walls will perform their intended function under all postulated loads and load combinations. In this regard, the NRC encourages the formation of an owners' group to establish both appropriate re-evaluation criteria and where necessary, a later confirmatory masonry test program to quantify the safety margins established by the re-evaluation criteria (this is discussed further in Item 2 below).

   a. Establish a prioritized program for the re-evaluation of the masonry walls. Provide a description of the program and a detailed schedule for completion of the re-evaluation for the categories in the program. The completion date of all re-evaluations should not be more than 180 days from the date of this Bulletin. A higher priority should be placed on the wall re-evlauations considering safety-related piping 2-1/2 inches or greater in diameter, piping with support loads due to thermal expansion greater than 100 pounds, safety-related equipment weighing 100 pounds or greater, the safety significance of the potentially affected systems, the overall loads on the wall, and the opportunity for performing plant surveys and, if necessary, modifications in areas otherwise inaccessible. The factors described above are meant to provide guidance in determining what loads may significantly affect the masonry wall analyses.

Response

The re-evaluation program is prioritized according to relative equipment sensitivity of safety-related equipment and piping. For the program description and reevaluation schedule see the response to item 3 below. It may be noted that no large size piping (2 1/2 inches or greater) is attached to the masonry walls, nor load due to thermal expansion on any support attached to the wall exceeds 100 pounds. Also, no safety related equipment weighing greater than 100 pounds is suported off these walls. However the program will evaluate all masonry walls with appropriate load combinations including seismic, pipe whip, jet impingement, and other loads as deemed necessary.

3. Existing test data or conservative assumptions may be used to justify the re-evaluation acceptance criteria if the criteria are shown to be conservative and applicable for actual plant conditions. In the absence of appropriate acceptance criteria a confirmatory masonry wall test program is required by the NRC in order to quantify the safety margins inherent in the re-evaluation criteria. Describe in detail the actions planned and their schedule to justify the re-evaluation criteria used in Item 2. If a test program is necessary, provide your commitment for such a program and schedule for submittal of a description of the test program and a schedule for completion of the program. This test program should address all appropriate loads (seismic, tornado, missile, etc). It is expected that the test program will extend beyond the 180 day period allowed for the other Bulletin actions. Submit the results of the test program upon its completion.

Response

Re-evaluation criteria are not being submitted at this time. Consolidated Edison concurs that re-evaluation criteria would best be devloped via the formation of a Utility Owner's Group, as suggested by the NRC.

This group would retain a selected consultant to respond to the 180 day requirement. In this manner, cohesive re-evaluation criteria could be developed for all group members. This will provide a uniform basis for reanalysis of masonry walls by all member utilities.

Shortly after the re-evaluation criteria have been established by the Owner's Group, we will inform the Commission of these criteria and the schedule for masonry wall re-evaluaton.