

SEP 8 1969

Peter A. Morris, Director, Division of Reactor Licensing
THRU: Saul Levine, Assistant Director for Reactor Technology, DRL

CONSOLIDATED EDISON COMPANY, INDIAN POINT NUCLEAR GENERATING UNIT NO. 2,
DOCKET NO. 50-247, DIESEL GENERATOR ARRANGEMENT

In our memorandum of March 17, 1969, RT-240A, we identified two possible backfit items.

The first concerned the independence of the onsite power and the possibility of its independence being compromised by the use of automatic breakers between redundant essential buses. The onsite power system as proposed is identical to that originally proposed for Indian Point No. 3. We took issue with the original Indian Point 3 design in our report to the ACRS and the ACRS letter contained a comment supporting our position. We believe that this item for Indian Point 2 is now resolved since the applicant stated to an ACRS subcommittee on August 23, 1969, that they intend to modify the Indian Point 2 design to be equivalent to that being provided for Indian Point No. 3.

The second issue raised in our March 17th memorandum was the housing of diesel generators side by side in a structure which does not appear to meet present day tornado requirements. We consider that the second issue is still unresolved. Consequently we were concerned to find the following statement in a draft report to the ACRS which was handed to the Indian Point subcommittee on August 23: "In our judgment, the redundancy provided in offsite power sources (see Section 8) and onsite power (gas turbine) are acceptable and do not require backfitting for additional protection for the diesel generators." While it might conceivably become necessary to come to this conclusion that no backfit is necessary, we do not believe the basis stated in the draft ACRS report is an acceptable one for making this decision. The basis for requiring onsite power has always been that it provides protection against the loss of offsite power because onsite power is not subject to failure from the same causes as offsite power. Therefore, it is not logical to conclude that the diesels need not be made immune to failure by a tornado because of the availability of offsite power, since offsite power is obviously vulnerable to the same tornado. We have asked the applicant questions concerning the gas turbine installation to determine whether it is located in a tornado-proof building. We have also asked whether there are other special features which might affect our evaluation of the electrical system. As yet we have received no response to these questions. At this time we have no information upon which to base a decision that there is no need to backfit the diesel generators at Indian Point 2.

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I recommend that a meeting be scheduled to discuss with DRL management what action should be taken with regard to the Indian Point 2 diesel generators. I further recommend that the draft report to the ACRS be modified to delete the recommendation concerning backfitting of the diesel generators before it is issued to the committee. We believe that it is premature to make the decision concerning backfitting at this time. We further believe that the applicant should be requested to expedite his response to our questions concerning the gas turbine and other design features so that the decision concerning backfit can be made in a timely manner.

Original signed by
Voss A. Moore

Voss A. Moore, Jr., Chief
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RT-671A
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