

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

September 9, 1975

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

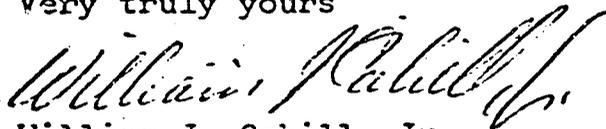
Mr. Karl R. Goller, Acting Director  
For Operating Reactors  
Division of Reactor Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Goller

In response to your letter of August 7, 1975, Con Edison has reviewed its program for testing containment leakage. Based upon this review, no design modifications to the plant are required to meet 10CFR Part 50, Appendix J requirements. Because these regulations were published after Con Edison's containment leakage test program was developed, modifications to the Technical Specifications are necessary, and are presently being drafted. Completion of these modifications are expected by November 14, 1975. At that time, the proposed changes to the Technical Specifications will be submitted to the Commission.

Con Edison is currently scheduled to meet with the Regulatory Staff this month to discuss a number of items of interpretation for a similar program that has been developed for Indian Point Unit No. 3. If changes are required as a result of that meeting, Con Edison will implement them for the Indian Point Unit No. 2 containment leakage test program prior to performing the next integrated leak rate test.

Very truly yours



William J. Cahill, Jr.  
Vice President

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### Section 3.3 ENGINEERED SAFETY FEATURES

requirements of 3.3.B-1 within the time period specified, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures. If the requirements of 3.3.B-1 are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition utilizing normal operating procedures.

- a. Fan cooler unit 23, 24, or 25 or the flow path for fan cooler unit 23, 24, or 25 may be out of service during normal reactor operation for a period not to exceed 24 hours, provided both containment spray pumps are demonstrated to be operable.

OR

Fan cooler unit 21 or 22, or the flow path for fan cooler unit 21 or 22 may be out of service during normal reactor operation for a period not to exceed 7 days provided both containment spray pumps are demonstrated daily to be operable.

- b. One containment spray pump may be out of service during normal reactor operation, for a period not to exceed 24 hours, provided the five fan cooler units are operable and the remaining containment spray pump is demonstrated to be operable.
- c. Any valve required for the functioning of the system during and following accident condition may be inoperable provided it is restored to operable status within 24 hours and all valves in the system that provide the duplicate function are demonstrated to be operable.

#### C. Isolation Valve Seal Water System

The isolation valve seal water system shall be operable when the reactor is critical.

#### D. Weld Channel and Penetration Pressurization System

The weld channel and penetration pressurization system shall be operable when the reactor is critical.

- b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values.
- c. In either case, if the IVSW System is not restored to an operable status within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

D. Weld Channel and Penetration Pressurization System (WC & PPS)

1. The reactor shall not be brought above the cold shutdown unless the electrical and mechanical penetrations and liner weld channels are continuously pressurized above 41 psig.
2. The requirements of 3.3.D.1 may be modified to allow any one header of the nitrogen or air pressurization system to be inoperable for a period not to exceed 4 consecutive days.
3. If the WC & PP System is not restored to an operable status within the time period specified, then:
  - a. If the reactor is critical, it shall be brought to the hot shutdown condition utilizing normal operating procedures. The shutdown shall start no later than at the end of the specified time period.
  - b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values.
  - c. In either case, if the WC & PP System is not restored to an operable status within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.