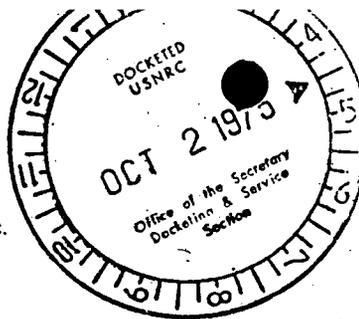


William J. Cahill, Jr.
Vice President

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September 30, 1975

RELATED CORRESPONDENCE

RE: Indian Point Unit No. 3
Docket No. 50-286

Mr. D. B. Vassallo, Chief
Light Water Reactors
Project Branch 1-1
Division of Reactor Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Vassallo:

The information requested by Items 1 and 2 of your letter of July 22, 1975 were forwarded to you on July 30 and September 4, 1975 respectively.

Items 3 and 4 requested information on vessel support loads and stresses and plant conditions resulting from postulations which were not design criteria for IP-3. In response to these requests, we performed a scoping investigation which led us to conclude that realistic prediction of the effects of the postulated condition would require detailed inelastic system analysis. After reviewing the present analytical capabilities for dynamic inelastic analysis and the structural complexity of the Indian Point #3 primary system supporting structures, we have determined that analytical methods are not available today that would lead to a realistic and conclusive assessment of the reactor shutdown capability. Although a precise evaluation of the time, manpower and other resources needed to provide the requested information is not possible, it is estimated that it would take more than a year to develop the necessary models and calculational methods. Considering this, we have concluded that plant safety could be more confidently assured by augmenting the inservice inspection of the reactor vessel nozzle to pipe welds to assure the integrity of these welds.

We therefore propose an augmented inservice inspection program which would provide a degree of surveillance exceeding that required by the 1974 version of ASME B & PV Code Section XI, and which would give assurance through the life of the plant that

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September 30, 1975

RE: Indian Point Unit No. 3
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no flaws will exist in the inspection region which could propagate and cause a loss of coolant accident. Table 1 describes the augmented schedule of inspections and compares it with the presently proposed Technical Specifications requirements.

The most significant feature of this program is the non-destructive examination of the cold leg nozzles from the outside pipe surface. Such a technique allows increased frequency of inspection of cold leg nozzles without removing the core barrel and makes the safe-end to pipe welds accessible.

The proposed inspection program has been evaluated on the basis of system transients and fracture mechanics data for the location of concern. This evaluation indicates that no allowable flaw would grow to critical size during the interval between scheduled inspections. Moreover, the baseline examinations for Unit No. 3 nozzle to safe-end welds showed no indications. Therefore, the proposed inservice inspection program will provide a very high degree of confidence that a pipe break will not occur at the reactor vessel nozzle.

We would be pleased to arrange a meeting to present whatever additional information you require to evaluate this proposed alternative resolution.

Very truly yours,



William J. Cahill, Jr.
Vice President

mp

cc: Mr. J. Bruce MacDonald
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Secretary
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Washington, D.C. 20555
ATTN: Chief, Docketing
and Service Section

Joseph Gallo, Esquire
Chief Hearing Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



TABLE 1

INDIAN POINT UNIT NO. 3 - PROPOSED AUGMENTED INSERVICE
INSPECTION PROGRAM

	Time of Inspection	Pipe	Weld Location	Type of Inspection
Present Technical Specification Requirements	First and second 3-1/3 year intervals	Two reactor outlets each interval	A	UT and V from inside of pipe
	Third 3-1/3 year interval	Four reactor inlets	A	UT and V from inside of pipe
Proposed Additional Inspections	First and second 3-1/3 year intervals	Two reactor inlets each interval	A, B	UT and PT from outside of pipe
	Third 3-1/3 year interval	Four reactor outlets	A, B	UT and V from inside of pipe

Weld Locations

- A. Nozzle to Safe-End
- B. Safe-End to Pipe

Types of Inspection

- UT - Ultrasonic Examination
- PT - Liquid Penetrant Examination
- V - Visual Examination