

Peter Zaras
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
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September 30, 1980

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

Director of Nuclear Reactor Regulation
ATTN: Mr. Thomas M. Novak, Assistant
Director for Operating Reactors
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Novak:

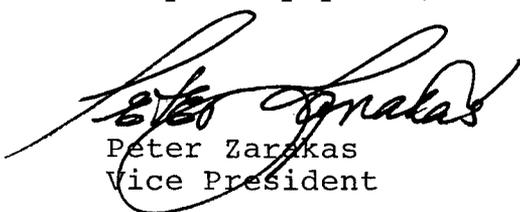
In response to your August 15, 1980 letter to All Westinghouse Pressurized Water Reactor Licensees, we have conducted a review of the Indian Point Unit No. 2 refueling procedures and technical specifications.

Existing plant refueling procedures specify a minimum water level in the reactor refueling cavity such that more than 23 feet of water is maintained above the reactor vessel flange. Thus, in practice, Indian Point Unit No. 2 already complies with the new requirement of your August 15, 1980 letter.

However, the present technical specifications require that during refueling operations a minimum of 23 feet of water be maintained "...above the top of the core." Accordingly, in order to maintain consistency between our refueling procedures and technical specifications and to complete our response to your August 15, 1980 letter, we will propose changes to the technical specifications to effect the requested technical clarification. It is presently anticipated that the technical specification proposal will be submitted by November 7, 1980.

Should you or your staff have any questions, please contact us.

Very truly yours,


Peter Zaras
Vice President

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