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Vice President

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Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
50-247

Dear Mr. Varga:

Per discussions with members of your staff today, we hereby request an immediate change to the Indian Point Unit No. 2 Technical Specifications. This change would permit on a one-time only basis an extension of three (3) days to the forty-eight (48) hour hot shutdown limitation with fan cooler unit no. 24 out of service. This fan cooler is out of service due to fan bearing/coupling failure. The requested additional time would preclude an unwarranted cooldown and cycling of the reactor coolant system and permit sufficient time for repair of the fan. A proposed technical specification page revision is attached.

An evaluation of maintaining the reactor at hot shutdown with one fan cooler unit out of service (FCU No. 24) beyond the forty-eight (48) hours permitted by Technical Specification 3.3.D has been performed. Since the energy sources, consistent with the reactor at hot shutdown after forty-eight (48) hours are reduced (versus the FSAR analysis for the design basis event of a large break LOCA at a power level of 3216 MW_{th}), significant margin in containment cooling would be available.

Even with FCU 24 out of service and assuming the most limiting single failure of diesel generator 21, one containment spray train and two FCU's will still be available for containment cooling (versus the FSAR analysis assumption of one spray train and three FCU's). Conservative calculations indicate that the containment design pressure of 47 psig will not be exceeded if one spray train and two FCU's are available. Since we will be maintaining the plant at hot shutdown, this assessment is certainly applicable and conservative with respect to the present request.

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Our experience with the fan cooler unit fans has been excellent. Only twice before have fan failures occurred. Our experience with diesel generator testing has also been excellent. In addition, a cold shutdown would extend the estimated offline time by four to five days beyond the extension time being requested herein (as opposed to staying at hot shutdown). To restore the unit to power at this point in the fuel cycle we would need a lengthy boron dilution and generate a large volume of liquid waste. Also, time and man-rem exposure would need to be expended to perform RHR check valve and containment leakage testing required to bring the plant out of cold shutdown. Furthermore, based on the results of the Indian Point Probabilistic Safety Study (IPPSS), the impact of one inoperable fan cooler unit on risk is negligible, particularly in review of the plant's hot shutdown status.

Thus, from a practical as well as a technical point of view, maintaining the plant at hot shutdown until fan repairs are completed is the preferred mode of operation.

Both the Station Nuclear Safety Committee and the Con Edison Nuclear Facilities Safety Committee have approved this change and have determined that it does not represent a significant hazards consideration. A formal application for a license amendment together with the appropriate filing fee will be submitted next week. Should you have any questions, please contact us.

Very truly yours,

John D. O'Toole
Vice President

attach.