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April 28, 1983

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

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 forty eight(48) hours to the current twenty-four(24) hour limitation with containment spray pump 21 out of service. The requested additional time is to preclude an unwarranted cooldown and cycling of the reactor coolant system and permit sufficient time for repair of the pump. A proposed technical specification page revision is attached.

An evaluation of maintaining the reactor at full power with one spray pump out of service (No. 21) beyond the twenty-four(24) hours permitted by Technical Specification 3.3.B has been performed. Even with spray pump 21 out of service and assuming the most limiting single failure of diesel generator 23, four Fan Cooler Unit's (FCU's) would still be available for containment cooling (versus the FSAR analysis assumptions of two spray pumps or five FCU's or one spray train and three FCU's). Conservative calculations indicate that the containment design pressure of 47 psig will not be exceeded if four FCU's are available. The methodology for this conservative analysis is the same in this application as that used in our application of September 13, 1982. In addition, the current river water temperature (i.e, 46°F) is such that the actual heat removal capability of four(4) FCU's is at least equal to the heat removal capability of five(5) FCU's at design conditions. Furthermore, while the conservative assumptions above consider no containment spray pumps, recirculation spray capability is unaffected and will be available with FCU's during long-term recirculation phase.

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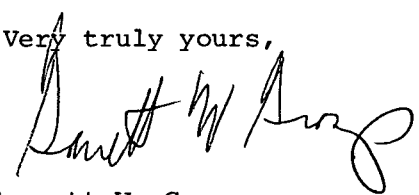
Although the capability to remove certain amounts of iodine activity from the containment is reduced under these "worst-case" assumptions, maintaining the containment integrity will ensure that thyroid doses are within the limits of 10CFR 100. Since our conservative analysis demonstrates that containment pressure remains below its design limit, integrity is insured. Furthermore, the Isolation Valve Seal Water System and the Weld Channel and Penetration Pressurization System, which are operable, provide an added level of defense not previously taken credit for in accident analysis and would limit actual containment leakage to essentially zero. This further assures that thyroid doses, without injection spray iodine removal capability, remain within the limits of 10CFR 100. Even under this "worst case" assumption the FCU's charcoal filtration banks will still be available to remove iodine from containment atmosphere.

The current Standard Technical Specification contained in NUREG-0452, Rev. 4 allows an out-of-service time of 72 hours for an operable containment spray pump. This application is consistent with that out-of-service time. Our experience with diesel generator testing has been excellent. Furthermore, based on the results of the Indian Point Probabilistic Safety Study(IPPSS), the impact of one inoperable spray pump on risk is negligible.

Thus, from a practical as well as a technical point of view, maintaining the plant at full power until spray pump 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,



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