

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

August 1, 1983

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

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Chief
Operating Reactor Branch No. 1
Division of Licensing

Dear Mr. Varga:

As requested by your staff, we hereby provide further clarification of the proposed technical specification change regarding the fuel storage building air filtration system contained in our February 14, 1983 Application.

The proposed change to specification 4.5.F would revise the required flow rate at which fuel storage building air filtration system surveillance testing would be performed from 25,000 cfm \pm 10% to 20,000 cfm \pm 10%. Based on discussions with members of the NRC Regulatory Staff, we understood that the flow rate to be specified in the specifications should be based on actual system capability. The reason for this was to ensure that air filtration system testing would be consistently performed within \pm 10% of the same flow rate so that data could be reasonably compared and trended. Although the system was designed to exhaust 20,000 cfm when operating in the incident mode, some rough performance testing on design data taken prior to the establishment of specific flow requirements in the technical specifications indicated that the system could exhaust approximately 25,000 cfm. Thus, 25,000 cfm \pm 10% was chosen as the flow rate to be put into the technical specifications.

The first formal testing after the issuance of technical specification 4.5.F was conducted during the late 1982 refueling/maintenance outage. With more refined data collection, a flow rate approximately equal to the design flow rate of 20,000 cfm was

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S. A. Varga

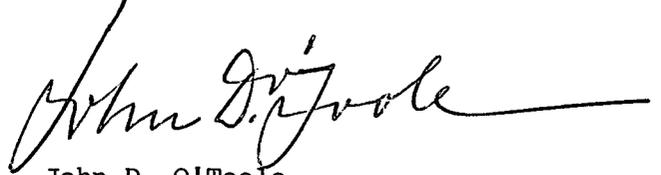
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obtained. Because this value is outside the range of 25,000 cfm \pm 10% and because we now expect future surveillance testing to yield flow rates within the range of 20,000 cfm \pm 10%, we are proposing a change to the technical specifications to render the technical specifications consistent with expected/required plant performance.

Should you or your staff require any further information, please contact us.

Very truly yours,

A handwritten signature in cursive script, reading "John D. O'Toole", with a long horizontal flourish extending to the right.

John D. O'Toole
Vice President