

**John D. O'Toole**  
Vice President

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

December 14, 1984

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 Reactors Branch No. 1  
Division of Licensing

Dear Mr. Varga:

Consolidated Edison Company of New York Inc. transmits herewith three(3) signed originals and forty(40) copies of a document entitled "Application for Amendment to Operating License," sworn to December 14, 1984. This application, if granted, would revise the Indian Point Unit No. 2 Technical Specifications to require augmented inservice inspection of the Indian Point Unit No. 2 reactor vessel during the second ten year inspection interval. The first augmented examination would not occur until late 1987. The text of the Technical Specification changes referred to in the Application and a Safety Assessment evaluating the changes from the standpoint of whether they would involve significant hazards considerations are attached to the application papers.

As you will recall, resumption of power operation following the Cycle 6/7 refueling outage was conditioned upon NRC review of the reported ultrasonic indication. Following several meetings and exchanges of technical information, the staff concluded, as we did, that the ultrasonic indication size is well within the maximum flaw size as calculated by fracture mechanics analyses and that, therefore, Indian Point No. 2 could be returned to service. The staff, however, did not concur that the indication size is less than ASME Section XI allowable. Consequently, you conditioned restart upon our commitment to submit within 60 days of your October 16, 1984 letter, a license amendment to include augmented inservice inspection of the Indian Point Unit No. 2 reactor vessel, consistent with mutually agreed upon Technical Specification language. The attached license amendment request is transmitted in accordance with that commitment.

Our review of the staff's Safety Evaluation report enclosed with your October 16, 1984 letter, and the reports of the staff consultants

8412200176 841214  
PDR ADOCK 05000247 PDR  
P

Rec'd wkck \$150.00  
#0318558

A00  
11

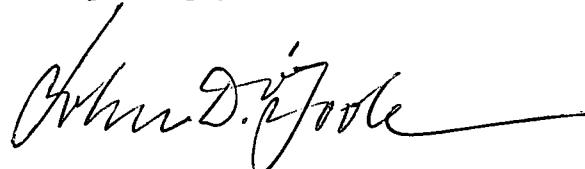
relative to the sizing of the indication, which we received subsequently, did not enable us to clearly establish the technical bases for the staff's conclusions or specifically determine what additional information might be developed to either resolve the staff's concerns or to prepare a satisfactory plan for any future efforts. None of these reports state a basis for a conclusion that augmented inservice inspection would enhance safety.

As previously indicated, implementation of the initial examination under the proposed augmented inspection program would not be required until late 1987 (forty months from July, 1984); we therefore respectfully request that you defer processing of the attached license amendment request. We will be approaching staff shortly with the intent of opening a dialogue that will permit us to clarify our understanding of the staff's position and establish an acceptable course of action for any future examinations. Holding this licensing action in abeyance pending clarification of the technical bases for staff's position will have no impact on the health and safety of the public and may be required in order to comply fully with the Backfitting Policy Statement (48 Fed. Reg. 44,173). Deferring the processing of this application will not preclude subsequent timely implementation of the appropriate license condition, should such a condition ultimately be determined necessary.

The appropriate application fee, in accordance with 10 CFR 170.12, is enclosed along with an Affidavit of Service attesting to state and local notification as required by 10 CFR 50.91.

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

Very truly yours,



John D. O'Toole  
Vice President

cc: w/encl.

Hon. Cheryl Harding  
Mayor, Village of Buchanan  
236 Tate Avenue  
Buchanan, New York 10511

Jay Dunkelberger  
Division of Policy Analysis and Planning  
New York State Energy Office  
Agency Building 2, Empire State Plaza  
Albany, New York 12222

Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 38  
Buchanan, New York 10511