

Stephen B. Bram  
Vice President

Consolidated Edison Company of New York, Inc.  
Indian Point Station  
Broadway & Bleakley Avenue  
Buchanan, NY 10511  
Telephone (914) 737-8116

May 10, 1987

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

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Withdrawal of License Amendment Request Relative  
to Containment Fan Cooler Operability

By letter dated June 12, 1987, Consolidated Edison submitted to NRC an application for amendment to the Indian Point Unit No. 2 operating license. This application requested an amendment to the Indian Point Unit No. 2 Technical Specifications which would revise the operability requirements of the containment fan cooler units, delete the requirements of their HEPA filters, charcoal adsorbers and associated fire protection and detection equipment, and revise the amount of time one containment spray pump may be inoperable. Subsequent to our discussions with NRC staff, including a meeting on April 13, 1988, we have reconsidered this request and hereby withdraw that part of the application relative to containment fan cooler operability (Section 3.3B). Relevant page changes, as requested, are attached hereto. We understand that the balance of our June 12, 1987 application will continue to receive staff review and we plan to submit a revised fan cooler operability amendment application in the near future.

Should the staff have any further questions on this matter, do not hesitate to contact us.

Very truly yours,



8805230142 880510  
PDR ADOCK 05000247  
P DCD

cc: Mr. William Russell  
Regional Administrator - Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1498

Ms. Marylee M. Slosson, Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop 14B-2  
Washington, DC 20555

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

- e. One channel of heat tracing may be out of service for 48 hours.
  - f. One refueling water storage tank low level alarm may be inoperable for up to 7 days provided the other low level alarm is operable.
3. When RCS temperature is less than or equal to 295°F, the requirements of Table 3.1.A-2 regarding the number of safety injection (SI) pumps allowed to be energized shall be adhered to.

**B. Containment Cooling and Iodine Removal Systems**

1. The reactor shall not be made critical unless the following conditions are met:
- a. The spray additive tank contains not less than 4000 gallons of solution with a sodium hydroxide concentration of not less than 30% by weight.
  - b. The five fan cooler units and the two spray pumps, with their associated valves and piping, are operable.
2. During power operation, the requirements of 3.3.B.1 may be modified to allow any one of the following components to be inoperable. If the system is not restored to meet the requirements of 3.3.B.1 within the time period specified, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures. If the requirements of 3.3.B.1 are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition utilizing normal operating procedures.
- a. One fan cooler unit may be inoperable during normal reactor operation for a period not to exceed 7 days provided both containment spray pumps are operable.
  - b. One containment spray pump may be inoperable during normal reactor operation, for a period not to exceed 24 hours, provided the five fan cooler units and the remaining containment spray pump are operable.
  - c. Any valve required for the functioning of the system during and following accident conditions may be inoperable provided it is restored to operable status within 7 days or 24 hours for the fan cooler or containment spray systems respectively, and all valves in the system that provide the duplicate function are operable.

The requirement regarding the maximum number of SI pumps that can be energized when RCS temperature is less than or equal to 295°F is discussed under specification 3.1.A.

The containment cooling and iodine removal functions are provided by  
: (a) fan-coolers and (b)  
containment spray with sodium hydroxide addition. During normal power operation, the five fan-coolers are required to remove heat lost from equipment and piping within containment at design conditions (with a cooling water temperature of 85°F).<sup>(4)</sup> In the event of a Design Basis Accident, any one of the following combinations will provide sufficient cooling to reduce containment pressure at a rate consistent with limiting off-site doses to acceptable values: (1) five fan-cooler units, (2) two containment spray pumps, (3) three fan-cooler units and one spray pump. Also in the event of a Design Basis Accident,

one containment spray pump and sodium hydroxide addition, will reduce airborne organic and molecular iodine activities sufficiently to limit off-site doses to acceptable values. These constitute the minimum safeguards for iodine removal, and are capable of being operated on emergency power with one diesel generator inoperable.

If off-site power is available or all diesel generators are operating to provide emergency power, the remaining installed iodine removal equipment

can be operated to provide iodine removal in excess of the minimum requirements. Adequate power for operation of the redundant containment heat removal systems (i.e., five fan-cooler units or two containment spray pumps) is assured by the availability of off-site power or operation of all emergency diesel generators.

One of the five fan cooler units is permitted to be inoperable during power operation. This is an abnormal operating situation, in that the normal plant operating procedures require that an inoperable fan-cooler be repaired as soon as practical.

However, because of the difficulty of access to make repairs, it is important on occasion to be able to operate temporarily without at least one fan-cooler. Compensation for this mode of operation, is provided by the high degree of redundancy of containment cooling systems during a Design Basis Accident.

The Component Cooling System is different from the system discussed above in that the pumps are so located in the Auxiliary Building as to be accessible