

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

January 11, 1991

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

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

SUBJECT: Response to Generic Letter 90-08

Pursuant to 10 CFR 55.11 and 10 CFR 50.12, Consolidated Edison Company of New York, Inc. (Con Edison) hereby requests an exemption from the simulator certification requirements of 10 CFR 55.45(b)(2)(iii) so as to defer the submission of NRC form 474, "Simulation Facility Certification," for the Indian Point Unit No. 2 (IP-2) simulator from the March 26, 1991 date provided in the rule until March 26, 1992. Con Edison further requests an exemption from the requirements of 10 CFR 55.45(b)(2)(iv) to allow training or NRC administered operating examinations to continue to be administered on the existing simulator until the new simulator is ready for training by May 26, 1992.

Con Edison intends to comply with 10 CFR 55.45(b) by certifying a plant referenced simulator in accordance with 10 CFR 55.45(b)(1)(ii). Con Edison completed proposal reviews and contract award to Westinghouse Electric Corporation in September 1988, with an original ready for training date of March 14, 1991. However, due to delays in model integration and the extensive testing necessary to certify the simulator, we are advised by the vendor that additional time will be required. The new IP-2 simulator, presently at the vendor project site will be ready for shipment to the plant site by February 1992, and ready for training and examinations by May 26, 1992. In the interim, the existing simulator has been, and will continue to be, maintained as appropriate and is presently being used to train and examine operators.

In accordance with the provisions of 10 CFR 50.12 and 55.11, Con Edison requests the following exemptions:

9101170240 910111  
PDR ADOCK 05000247  
P PDR

A005  
1/0

1. A specific exemption to defer the requirements of 10 CFR 55.45(b)(2)(ii) to submit NRC form 474 for the IP-2 simulator until March 26, 1992.
2. A specific exemption to 10 CFR 55.45(b)(2)(iv) to permit Con Edison to continue to use the existing simulator for training and administration of operating tests until the new simulator certification is accomplished.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager of Nuclear Safety & Licensing.

Very truly yours,

*John A. Basile*

cc: Mr. Thomas T. Martin  
Regional Administrator - Region I  
US Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Francis J. Williams, Jr., Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II  
US Nuclear Regulatory Commission  
Mail Stop 14B-2  
Washington, DC 20555

Senior Resident Inspector  
US Nuclear Regulatory Commission  
PO Box 38  
Buchanan, NY 10511