

Peter Zarakas
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-3000

August 1, 1980

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

Director of Nuclear Reactor Regulation
ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

This letter is in response to your letter of June 30, 1980 to William J. Cahill, Jr. regarding item C.4 of Appendix A to the February 11, 1980 Confirmatory Order, specifically, the schedule proposed in our April 11, 1980 letter to complete by the fall of 1982 the installation of the Anticipated Transient Without Scram (ATWS) instrumentation modification justified in the December 30, 1979 letter from T. N. Anderson to S. H. Hanauer. In your letter you stated that the schedule for Indian Point should be accelerated relative to other Westinghouse units because of the risk you believe Indian Point represents. We believe this perception to be unfounded and contrary to the best available analyses of risk at Indian Point.

In a May 23, 1980 letter from William J. Cahill (Con Edison) and Paul J. Early (PASNY) to Harold R. Denton we submitted a Westinghouse/Offshore Power Systems Report on the Evaluation of Residual Risk for the Indian Point Power Plant. The conclusions of this letter strongly dispute your belief about the risk Indian Point represents with a clear quantitative probabilistic analysis.

As you undoubtedly know on June 12, 1980 a Commission Task Force published an extensive report (SECY-80-283) on the risk of Indian Point as compared to other sites and other plants. The report concludes that the overall risk of the Indian Point reactor "is about the same as a typical reactor on a typical site", and that the risk to individuals living in the vicinity of Indian Point is much less than at a typical site. On July 11, 1980 the Nuclear Regulatory

A001
3
1/0

8008060255

p

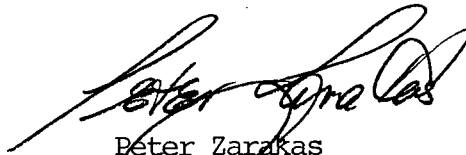
Commission in a public meeting, "Discussion & Possible Vote On Interim Operation at Indian Point", reviewed the Task Force Report. The Commission conclusion, based on the Task Force Report, was that continued operation for Indian Point was acceptable. In view of these reports, we request clarification from you on the matter of Indian Point risk, inasmuch as you are evidently of the view that risk should affect our timetable for compliance.

With regard to the schedule contained in our April 11, 1980 letter for the design, procurement and installation of AMSAC at Indian Point Unit No. 2, the completion dates are realistic and are based on a schedule that includes the necessary front end lead time to provide adequate interaction between Consolidated Edison and other parties, such as, Architect-Engineers, Westinghouse and the NRC. Also expected during this engineering phase was the NRC final generic input regarding the AMSAC design. Such an interaction at the early stage is necessary to sufficiently define the AMSAC scope of work. The schedule presented in our April 11, 1980 letter, provided for normal preparation of equipment specifications, competitive bidding, QA reviews, component development, qualification activities, production, and installation consistent with planned refueling outages. In our view this proposed schedule is very realistic considering the fact that the Westinghouse AMSAC concept still has not received NRC final concurrence.

Based on the foregoing, and until you can more fully clarify your position, we consider that our ATWS timetable is reasonable.

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

Very truly yours,



Peter Zarakas
Vice President