

John D. O'Toole
Vice President

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May 10, 1982

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:

Transmitted as Attachment A to this letter is our response to your April 6, 1982 letter requesting clarification of certain areas identified in our August 7, 1981 response to Generic Letter No. 81-14, "Seismic Qualification of Auxiliary Feedwater Systems."

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

Very truly yours,

John D. O'Toole

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Attachment A

Response to NRC's April 6, 1982 letter
concerning
Seismic Qualification of Auxiliary Feedwater Systems

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
May 1982

Question 1: Enclosure 1 of Generic Letter 81-14 (GL 81-14) defines the auxiliary feedwater (AFW) system to be considered as:

- (a) "The AFW system boundary from suction to discharge (including the water source and heat sink) shall include those portions of the system required to accomplish the AFW system function and connected branch piping up to and including the second valve which is normally closed or capable of automatic closure when the safety function is required."

Response: This item is discussed in our August 7, 1981 response (pgs 3-5) to Generic Letter No. 81-14. Specific instances where system design does not strictly agree with the boundary definition of Enclosure 1 to Generic Letter 81-14 are identified therein and justification for boundary selection provided.

Question 1: Enclosure 1 of Generic Letter 81-14 (GL-81-14) defines the auxiliary feedwater (AFW) system to be considered as:

(b) "The AFW system boundary shall also include any portion of branch piping that is structurally coupled to the AFW system boundary such that seismic response of the branch piping transmits loads to the AFW system. As a minimum, this includes the branch lines outside the AFW system boundary to a point of three orthogonal restraints."

Response: The AFW system boundary includes those portions of branch piping that are structurally coupled to the AFW system boundary such that seismic response of the branch piping transmits loads to the AFW system. In such instances, qualification of the AFW system includes the branch lines outside the AFW system boundary to a point of three orthogonal restraints.

Question 1: Enclosure 1 of Generic Letter 81-14 (GL 81-14) defines the auxiliary feedwater (AFW) system to be considered as:

- (c) "All mechanical and electrical equipment, piping (e.g., instrument air), conduits and cable trays, which are necessary or contain items which are necessary for the operation of the AFW system, shall also be considered."

Response: A detailed discussion of AFW system mechanical and electrical equipment seismic qualification is contained in our August 7, 1981 response to Generic Letter No. 81-14. All equipment necessary or which contain items necessary for the operation of the AFW system are identified therein.

Question 1: Enclosure 1 of Generic Letter 81-14 (GL 81-14) defines the auxiliary feedwater (AFW) system to be considered as:

(d) "In addition, the structures housing these systems and components shall be included."

Response: As noted in our August 7, 1981 response to Generic Letter No. 81-14, all structures supporting or housing AFW system components are Seismic Category I structures.