

John D. O'Toole
Vice President

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4 Irving Place, New York, NY 10003
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October 8, 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:

In our March 5, 1982 submittal letter for the Indian Point Probabilistic Safety Study (IPPSS), we identified a number of plant improvements which were determined during the course of performing the plant evaluation as representing cost effective risk reduction measures. It was stated in that letter that steps were being taken to implement these improvements and that they had been factored into the study model.

Improvement No. (5) of Attachment A to the March 5, 1982 letter required "...System modification, procedural change or verification testing to ensure that sufficient backpressure will be maintained in the service water system to prevent service water pump overload for cases where only one service water pump is operating with the system in accident configuration." During the recently begun refueling/maintenance outage for Indian Point Unit No. 2, a service water system test was performed with only one service water pump in service on the essential header with that header aligned in its accident configuration. This test, conducted on September 20, 1982 verified that with the 2" vent in the diesel generator cooling water header closed, with only one essential service water pump operating, and with the system in accident configuration, the single pump performed satisfactorily with all parameters within acceptable ranges, and provided sufficient cooling water flow to the diesel generators.

It is our conclusion with respect to the above issue, that, based on the test results the IPPSS model reflects the actual Indian Point Unit No. 2 plant configuration. Steps are being taken to provide a fixed, in-place closure for the 2" vent prior to the completion of the current refueling/maintenance outage.

With respect to the other plant improvements described in Attachment A to the March 5, 1982 letter, all except the ATWS modification are scheduled for implementation prior to returning Indian Point Unit No. 2 to service

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from the current refueling/maintenance outage. With regard to ATWS, we will shortly be submitting amendatory materials to the IPPSS to reflect that the ATWS modification has not been incorporated into the plant.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "John D. O'Toole". The signature is written in black ink and is positioned above the typed name and title.

John D. O'Toole
Vice President

cc: J. W. Hickman, Supervisor
Nuclear Fuel Cycle Systems
Sandia Laboratories
Albuquerque, New Mexico, 87115