

John D. O'Toole
Vice President

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February 25, 1983

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:

Attachment A to this letter contains our response to NRC questions regarding the Inservice Inspection Program for Indian Point Unit No. 2. These questions resulted from a prior telephone conference between your representatives and ours. The information contained in Attachment A completes our response to this issue.

Attachment B identifies additional provisions to be included in our Inservice Inspection Program regarding duration and temperature of hydrostatic tests and QA program controls applicable to the pump and valve testing program. ✓

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

Very truly yours,



cc: Mr. Walter Rekito
Reactor Engineering Inspector
U. S. Nuclear Regulatory Commission
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ATTACHMENT A

Response to NRC Questions

**Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
February, 1983**

QUESTION

Paragraphs 4, 5, 6 Page 7 Supplement 3 February 1979 Inservice Inspection and Testing Program - Indian Point Unit No. 2. Provide clarification as to which systems are subject to the relief requests identified in these paragraphs.

PARAGRAPH 4

Portions of piping systems that cannot be pressurized or pressurized to the specified pressure, either through the reactor coolant system or by installed equipment, will not be pressurized unless provisions for connecting an external pressure source and adequate isolation capability currently exist.

RESPONSE

Paragraph 4 was developed in anticipation of identifying portions of systems that could not be readily pressurized. Further review of affected systems indicates that apparently all systems can be pressurized. Paragraph 4, therefore, is not now anticipated to be applicable. However, if during preparation of detailed testing procedures it is determined that portions of systems cannot be pressurized they shall be identified and documented during testing.

QUESTION

Paragraphs 4, 5, 6 Page 7 Supplement 3 February 1979 Inservice Inspection and Testing Program - Indian Point Unit No. 2. Provide clarification as to which systems are subject to the relief requests identified in these paragraphs.

PARAGRAPH 5

Where overpressure protection is provided for normal plant operation, test pressures shall not exceed the limits or set points established for normal plant operation or the pressures specified by Section XI, whichever is less.

RESPONSE

The systems subject to the above provisions are:

Condensate and Boiler Feed Pump Suction
Auxiliary Coolant
Safety Injection
Chemical and Volume Control
Sampling
Service Water
Waste Disposal
Main Steam

QUESTION

Paragraphs 4, 5, 6 Page 7 Supplement 3 February 1979 Inservice Inspection and Testing Program - Indian Point Unit No. 2. Provide clarification as to which systems are subject to the relief requests identified in these paragraphs.

PARAGRAPH 6

Where the hydrostatic test pressure and temperature requirements of Section XI may potentially degrade the operability or integrity of piping systems or components, the pressures and temperatures shall be revised appropriately.

RESPONSE

The above provision was intended to assure that in cases where piping systems or components may be adversely affected by hydrostatic tests due to normal plant configurations test pressures and/or temperatures will be revised such that the systems or components can be protected against excessive test pressures.

A generic example of where such conditions may exist is the case where pump suction design and operating pressures are considerably lower than the corresponding pump discharge pressures. Typically, in these cases if the pump is exposed to hydrostatic tests based on discharge pressures the pump casing, pump seals and a portion of the suction side would be exposed to excessive pressures because the pump internals preclude

isolation of the pump discharge from the pump suction. In such cases, it is planned to pressure test the discharge side at higher pressures up to the pump discharge isolation valve and correspondingly test with lower pressures up to the pump suction isolation valve. The pump and the portion of piping between the isolation valves will be tested utilizing normal system operating pressures and temperatures.

Another example is that of pump shaft seals designed for normal pump operating conditions. Higher hydrostatic test pressures could jeopardize shaft seal integrity. In such cases the pump and the portion of piping between the isolation valves will be tested utilizing normal system operating pressures and temperatures. The systems which are subject to one or more of these conditions are:

- Condensate and Boiler Feed Pump Suction
- Boiler Feedwater
- Auxiliary Coolant
- Safety Injection
- Chemical and Volume Control
- Service Water

ATTACHMENT B

Added Provisions to the Inservice Inspection Program

**Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
February, 1983**

(1) Add a new paragraph 7 to page 7 supplement 3 dated February 1979

7. In lieu of the requirements of maintaining hydrostatic test pressures and temperatures for at least four hours prior to the performance of examinations as stipulated in IWA 5210(a) the hydrostatic test pressures and temperatures shall be maintained for at least 4 hours for insulated systems and 10 minutes for non-insulated systems or components.

BASIS

The basis for decreasing the test pressure time for non-insulated systems and components is that potential leakage for non-insulated systems and components can be readily detected and cannot be masked by insulation. The 10 minute test pressure time specified for non-insulated systems and components is consistent with later approved Section XI provisions.

(2) Add a new paragraph 8 to page 7 supplement 3 dated February 1979.

8. In lieu of maintaining a minimum hydrostatic test temperature of 100°F as specified in IWC-5220 (a) the minimum hydrostatic test temperature may be equivalent to ambient temperature, nominally 70°F.

BASIS

Typical carbon steel and stainless steel materials of construction utilized in systems governed by the provisions of IWC-5220 are such that ambient hydrostatic test temperatures, nominally 70°F, will not adversely impact on the material fracture toughness properties.

- (3) Revise paragraph on pages 7 and 8 of supplement 3 dated February 1979 as indicated in margin.

Authorized Inspector

As an alternate to requiring an Authorized Inspector to document, witness, verify, approve etc., inservice inspections, tests and repairs to Quality Group A, B and C systems and components, verification of the adequacy of these activities will be accomplished as described in the Con Edison Quality Assurance Program in effect at time of inspection, test or repair. This program provides for:

- a. The review by Quality Assurance and Reliability of nondestructive examination techniques and methods as well as the qualifications of personnel performing nondestructive examinations.
- b. A vendor qualification process.
- c. Monitoring by Site Quality Assurance to assure compliance with approved procedures.
- d. Development of valve and pump test procedures by the Test and Performance Engineer who is independent of the plant operations group.
- e. Review of test results by the Test and Performance Engineer
- f. Audits of the overall inservice inspection and test program by the central QA group.

Additionally the Authorized Inspector will be utilized to verify the adequacy of repairs to all ASME B&PV Code Section III stamped pressure vessels. This approach is consistent with current New York State law which does not invoke Section XI of the ASME B&PV Code as part or it's boiler and pressure vessel requirements.

BASIS

The above revision:

- o reflects a change in reporting responsibilities of the Quality Assurance Engineer (NPG) to a centralized QA organization
- o describes in greater detail the QA program controls that apply to the valve and pump testing program
- o describes the audit activities of the central QA group in the inservice inspection and testing program