

John D. O'Toole  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, NY 10003  
Telephone (212) 460-2533

July 26, 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:

By letter dated May 3, 1983, we requested an amendment to the Indian Point Unit No. 2 Operating License to revise the operability requirements and limiting conditions for operation for the reactor cavity level monitoring instrumentation contained in the Technical Specifications (Appendix A to DPR-26). Subsequently, by letter dated June 14, 1983, we provided additional information and justification in support of our May 3, 1983 license amendment request.

On Friday, July 15, 1983, the reactor cavity continuous level monitoring system was declared inoperable due to a drift in the indicated level thereby invoking the limiting condition for operation specified in Technical Specification 3.1.F.1.b(5). The independent reactor cavity level alarms remained operable. A containment entry was made and the reactor cavity found dry. Our investigation into the cause of the drift condition is underway and plans for the installation of a more reliable device are under consideration. With this system inoperable, Technical Specifications 3.1.F.1.b(5) and 3.1.F.1.c require either a visual examination of containment once per shift or a plant shutdown if it is not restored to operable status within thirty (30) consecutive days.

As indicated in our previous letters, repair or calibration of the reactor cavity continuous level monitor is effectively precluded with the reactor at power due to the temperature, humidity, radiation and limited access in the reactor cavity. In addition, visual examination once per shift is expected to result in a total personnel exposure of approximately five thousand (5000) millirem per week. We believe such personnel exposure is contrary to ALARA philosophy, particularly in light of the additional reactor cavity level monitoring instrumentation already installed and operational and our pending license amendment request.

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Of the courses of action available, shutdown of the plant is clearly not justified with redundant cavity level alarms operable; ALARA considerations, in our judgement, rule out once-per-shift containment entries. Accordingly, we urge your timely approval of our May 3, 1983 request for a change in the Technical Specifications for Indian Point 2 to preclude the necessity for either of these undesirable alternatives. We believe the provisions of 10 CFR 50.91(a)(5) are applicable to this request.

Very truly yours,

A handwritten signature in black ink, reading "John D. O'Toole". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John D. O'Toole  
Vice President