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March 15, 1984

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. Darrell G. Eisenhut, Director
Division of Licensing

Dear Mr. Eisenhut:

By letter dated November 4, 1983 we responded to your letters dated July 8, 1983 and October 21, 1983 concerning "Required Actions Based on Generic Implications of Salem ATWS Events".

In that letter we described our programs in response to the various issues raised and identified some areas where additional review would be necessary in order to respond to your requests.

Attachment A to this letter provides the current status of those remaining items.

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

Very truly yours,

John D. O'Toole

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Attachment A

Review Status

Generic Letter 83-28

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
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1.1 Post Trip Review (Program Description & Procedures)

Position

Licenseses and applicants shall describe their program for ensuring that unscheduled reactor shutdowns are analyzed and that a determination is made that the plant can be restarted safely. A report describing the program for review and analysis of such unscheduled reactor shutdowns should include, as a minimum:

Item 3 The necessary qualifications and training for the responsible personnel.

Status: Qualification and training for personnel performing initial post-trip reviews were described in the November 4, 1983 submittal. Modification of the licensed operator qualification and requalification training programs to require training in post-trip reviews has been completed. Such training was performed in 1983 and will be included in the 1984 qualification and requalification programs.

Item 5 The methods and criteria for comparing the event information with known or expected plant behavior (e.g., that safety related equipment operates as required by Technical Specifications or other performance specifications related to the safety function).

Status: A description of our program in this area was provided in our November 4, 1983 submittal. We indicated that we are participating in the development of the INPO good practice OP-211 "Post-Trip Reviews" and that a revised post-trip review procedure will be developed incorporating the recommendations of the "final" good practice. In the interim a draft post-trip review procedure has been developed following the guidance provided in the "draft" good practice. This draft post-trip review procedure is currently in our procedure review cycle and is expected to be in effect by April 30, 1984.

2.1/2.2 Equipment Classification and Vendor Interface

Item 2 For vendor interface, licenseses and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is

paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with action 2.2.1 above (equipment qualification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical mailings. It shall define the interface and division of responsibilities among the licensee and the nuclear and nonnuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of applicable instructions for maintenance work on safety-related equipment are provided.

Status: A description of our programs in this area was provided in our November 4, 1983 submittal. We further indicated that we were participating in the INPO sponsored Nuclear Utility Task Action Committee (NUTAC) working to develop a generic industry response to this issue and that we planned to review the final report of that committee for applicability to Indian Point Unit No. 2. We are currently reviewing the draft NUTAC report. The final NUTAC report is expected to be published shortly. We currently anticipate being able to provide a response to this issue 90 days following receipt of the final NUTAC report.

3.1/3.2 Post-Maintenance Testing (Reactor Trip System Components and All-Other Safety Related Components)

Item 1 Licensees and applicants shall review (extend the review of) their test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system (and all safety-related equipment) is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

Status: A description of the means by which post-maintenance testing is required to be accomplished was provided in our November 4, 1983 submittal. In addition we indicated that a generic system of post-maintenance tests is being developed and that the post-maintenance test program outlined in Station Administrative Order (SAO) 104 is undergoing extensive review and revision. It should be noted that implementation of the generic system of post-maintenance tests is a long term program that will build on existing test procedures. Review and revision to the administrative aspects of the post-maintenance test program as described in SAO-104 is underway.

Item 2 Licensees and applicants shall check vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

Status: In our November 4, 1983 submittal we indicated that this item is closely coupled with item 2.1/2.2 concerning vendor interface and that we would respond to this issue following our review of the results of the NUTAC efforts. As noted previously, the NUTAC's final report is expected to be published shortly. On that basis we expect to respond to this issue 90 days following receipt of the final NUTAC report.

We also indicated that we had, in conjunction with the Westinghouse Owner's Group, contracted with Westinghouse for the compilation of all existing maintenance information regarding Westinghouse reactor trip breakers. That effort has been completed by Westinghouse and has been provided to Con Edison in the form of Westinghouse Technical Bulletin 83-02 Rev. 1, Addendum 1. Our review of that bulletin has been completed. Aspects of the bulletin that were deemed appropriate for the Indian Point Unit No. 2 reactor trip breakers are being incorporated into the applicable programs. Company Engineering recommendations are being utilized in test and maintenance procedures as appropriate.

4.2 Reactor Trip System Reliability (Preventive Maintenance and Surveillance Program for Reactor Trip Breakers)

Position: Licensees and applicants shall describe their preventative maintenance and surveillance program to ensure reliable reactor trip breaker operation. The program shall include the following:

Item 1 A planned program of periodic maintenance, including lubrication, housekeeping, and other items recommended by the equipment supplier.

Status: A description of the programs in effect at the time was provided in our November 4, 1983 submittal. We also indicated that we were evaluating maintenance related recommendations contained in INPO's Significant Operating Experience Report 83-8 relating to the Salem Event. That review has been completed and the results are being factored into our programs as applicable.

Item 3 Life testing of the breakers (including the trip attachments on an acceptable sample size).

Status: In our November 4, 1983 submittal we indicated that Westinghouse was conducting life cycle testing of

the shunt and undervoltage trip attachments of the reactor trip breakers for the Westinghouse Owner's Group. That program is expected to be completed in the second quarter of 1984. Con Edison plans to review the results of that effort and incorporate applicable recommendations.

Item 4 Periodic replacement of breakers or components consistent with demonstrated life cycles.

Status: see response to item 3 above.

4.3 Reactor Trip System Reliability (Automatic Actuation of Shunt Trip Attachments for Westinghouse and B&W plants)

Status: In our November 4, 1983 submittal we indicated that we plan to implement this modification during the 1984 refueling outage. A plant specific design package is scheduled for submittal by April, 1984.

4.5 Reactor Trip System Reliability (System Functional Testing)

Position: On-line functional testing of the reactor trip breaker system, including independent testing of the diverse trip features, shall be performed on all plants

Item 1 The diverse trip features to be tested include the breaker undervoltage and shunt trip features on Westinghouse....plants....

Status: In our November 4, 1983 submittal we described the current provisions for independent testing of the undervoltage and shunt trip attachments to the reactor trip breakers. Design testing provisions for the modified design (as described in 4.3 above) will be described in the plant-specific design package to be submitted by April, 1984.

Item 3 Existing intervals for on-line functional testing required by Technical Specifications shall be reviewed to determine that the intervals are consistent with achieving high reactor trip system availability when accounting for considerations such as:

1. uncertainties in component failure rates
2. uncertainty in common mode failure rates
3. reduced redundancy during testing
4. operator errors during testing
5. component wearout caused by testing

Status:

In our November 4, 1983 submittal we indicated that, in light of the Salem event, we had reviewed our existing surveillance test program, its frequencies, and the fact that there have been no recorded failures of the breakers to open on demand, and that, based on that review, we continue to find the program acceptable. We also indicated that we planned to review the Westinghouse-developed test interval optimization methodology. On the basis of the results of our review and the NRC Safety Evaluation Report (yet to be issued) for the Westinghouse-developed methodology, Con Edison will consider the desirability of proceeding with the plant specific reviews that would be required to support any changes to Technical Specification surveillance intervals.