

John D. O'Toole
Vice President

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

May 7, 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. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Dear Mr. Varga:

By letters dated November 20, 1981 and September 29, 1983 you transmitted the status of your review of the containment vent and purge issue for Indian Point Unit No. 2 (Multiplant Action B-24 and NUREG-0737, Item II.E.4.2). In your November 20, 1981 letter, you provided recently developed preliminary sample Technical Specifications, requesting that we review the existing Technical Specifications against the sample and propose a Technical Specification change request for any areas in which the existing specifications needed expansion.

In reviewing those sample Technical Specifications we found that they contain two differing Limiting Conditions For Operation (LCO). Specification 3.6.1.7. addresses itself to the containment purge and vent valves specifically, while Specification 3.6.3 addresses itself to containment isolation valves in general. Since the containment purge and vent valves are also containment isolation valves, we question which LCO is intended to apply. We note that Specification 3.6.1.7. appears to provide some relaxation with respect to Specification 3.6.3. For plants with purge and vent valves that may be open by Technical Specification, plant operation is permitted to continue for up to 72 hours with one valve inoperable, whereas Specification 3.6.3 limits that time to four hours.

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Accordingly, clarification of the intent of the sample Technical Specifications with regard to application of the LCO's is requested. In addition, no bases were provided to support the sample Technical Specifications. The staff's bases for the LCO intended to apply is requested, so that we may justify a finding of no significant hazards consideration under the standards of 10 CFR 50.92 when responding to your request for a Technical Specification change.

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

cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511