

John D. O'Toole  
Vice President

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May 17, 1984

Re: Indian Point Unit No. 2  
Docket No. 50-247

Director of Nuclear 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:

This is in response to your letter dated January 31, 1984 which requested additional information relative to our December 29, 1981 proposed Technical Specification change request regarding NUREG-0737 Items II.F.1.1 and II.F.1.2. Your letter indicated that no changes to the Technical Specifications were proposed addressing radioiodine monitoring and instrument surveillance requirements.

Proposed technical specification changes regarding the requirements for radioiodine monitoring in consonance with Item II.F.1.2 were not included in our December, 1981 submittal because we believed at the time that these requirements would be covered by existing radioiodine effluent monitoring technical specifications. However, our review of the guidance contained in Generic Letter 83-37 "NUREG-0737 Technical Specifications" indicates that although the existing provisions would satisfy in part the intent of the generic technical specifications requirement for in plant effluent radiation monitors, additional technical specifications would be necessary to ensure that a program for effluent monitoring of radioiodines during accident conditions will be provided and maintained. These additional technical specifications are now under consideration.

Also, at the time of our December, 1981 technical specification change request, we believed that existing technical specifications addressing surveillance requirements (i.e., channel check, calibration, and functional testing) for process effluent monitors could be applicable to cover high range effluent monitoring instrumentation.

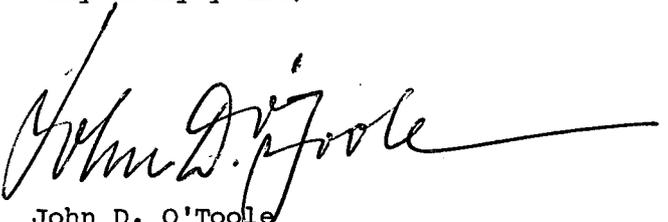
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Therefore, no surveillance technical specification change request was submitted with our original application. However, in expectation of the staff's issuance of the Appendix I Radiological Effluent Technical Specifications (RETS) for routine monitoring instrumentation, we are reconsidering our position. A proposed technical specification change request which would clarify the surveillance requirements for high range effluent monitors separate from normal effluent monitors is under consideration and will be submitted along with any proposed technical specifications resulting from our complete review of Generic Letter 83-37. Accordingly, we hereby request a withdrawal of our December 29, 1981 application so that we may resubmit a complete application for technical specification changes regarding Items II.F.1.1 and II.F.1.2. We expect that our response to Generic Letter 83-37 will be submitted by July 15, 1984.

We trust this letter is responsive to your requirements. If you or your staff have any further questions, please contact us.

Very truly yours,



John D. O'Toole  
Vice President

cc: Mr. Thomas Foley, Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 38  
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