John D. O'Toole
Vice President

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July 3, 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 Reactor Branch No. 1
Division of Licensing

Dear Mr. Varga:

This letter responds to your letter of May 2, 1984 concerning the instrumentation for monitoring inadequate core cooling (ICC) at Indian Point Unit No. 2 (IP-2) and our response to Generic Letter (GL) No. 82-28. Since our response we have been engaged in various activities to implement the initiatives of Supplement 1 to NUREG-0737 (GL-82-33). The program goals set forth in our April 15, 1983 response to Supplement 1 included the need for post accident instrumentation to monitor inadequate core cooling, utilizing the three systems presented in our March 23, 1983 submittal. Although the requirements of item II.F.2 of NUREG-0737 relative to ICC instrumentation might appear to stand alone, they are also part of Regulatory Guide 1.97, which is in turn integral to our Supplement 1 implementation plan.

Under a separate, but relevant licensing action, by letter dated March 8, 1984 from E. H. Johnson, Chief-Reactor Project Branch 1 of NRC Region IV to O. R. Lee, Vice President - Public Service Company of Colorado discussing Technical Specifications for the Fort Saint Vrain facility, it was noted that item II.F.2 has been superseded by the implementation of Regulatory Guide 1.97. We concur with this and in our Supplement 1 implementation plan, we identified several places where the longer term evaluations required for purposes of II.F.2 and GL 82-28 can only be properly performed in conjunction with other activities being carried out in addressing Supplement 1 to NUREG-0737. In particular, we have identified interfaces with the following:

a) upgrading of emergency operating procedures,
b) detailed control room design review,
c) implementation of SAS/SPDS, and
d) evaluations for Regulatory Guide 1.97 revision 2.

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The request for further information contained in your May 2, 1984 letter does not acknowledge these interfaces. For example, the equipment qualification review of the long term post-accident monitoring instruments for regulatory guide 1.97 revision 2 includes an evaluation of the following IP-2 components:

a) subcooling margin monitor,
b) core exit thermocouples, and
c) Reactor Vessel Level Instrumentation System,

which comprise IP-2's ICC instrumentation. This evaluation is also requested in your May 2, 1984 letter. To separately review this instrumentation outside of our overall Supplement 1 program would place an unnecessary burden on our resources and, more importantly, would impede our efforts to integrate the initiatives of Supplement 1.

Item II.F.2 of NUREG-0737 and the initiatives of Supplement 1 to NUREG-0737 have a common goal of aiding the operator in diagnosing and coping with transients and accidents. We therefore believe the most efficient way of responding to your May 2, 1984 requests is through the interfaces that are identified in our March 23, 1983 response to GL-82-28 and our integrated Supplement 1 implementation plan. Only by this integrated approach will we be able to properly and systematically address the ICC monitoring instrumentation and the Staff's particularized concerns set forth in your May 2, 1984 letter.

If you have any questions or would like to discuss this matter further, do not hesitate to call us.

Very truly yours,

John D. O'Toole

John D. O'Toole
Vice President

cc: Office of Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
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