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 17, 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:

This letter is in response to your letters of April 24, and June 28, 1984 transmitting NRC's Safety Evaluation (SER) (see Attachment B) for the Indian Point Unit No. 2 low temperature overpressure protection system. The staff has concluded that, contingent upon satisfactory implementation of Technical Specifications, the OPS is an adequate solution to the problems of transients at low pressure and temperature. In that regard, the staff has pointed out three areas of concern that should be addressed in Technical Specifications. Attachment A to this letter addresses those concerns. Attachment B to this letter clarifies certain information/assumptions contained in the staff's safety evaluation relating to plant specific aspects of the low temperature overpressure protection system.

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

Very truly yours,

John D. O'Toole

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ATTACHMENT A

Item 1 (SER Page 13, last paragraph)

"In addition to the statements in this "Basis" there should be a Technical Specification that prohibits the start of a reactor coolant pump when the temperature of its steam generator is more than 40°F higher than the reactor coolant system."

Response:

Specification 3.1.A.4.a. of our February 14, 1983 submittal requires that the OPS be armed and operable when the RCS temperature is less than or equal to 310°F, except as permitted by Table 3.1.A-2. Table 3.1.A-2 contains restrictions on starting a reactor coolant pump as such operation pertains to the potential for overpressurization events. Specifically, with OPS operable at or below 310°F, a reactor coolant pump may be started or jogged with no other reactor coolant pumps operating if "the temperature of all steam generators is less than or equal to 40°F higher than the RCS temperature and RCS temperature is less than or equal to 282°F, and pressurizer level is between 30-85% of span." Similar conditions/restrictions are placed on RCP operation for other combinations of plant conditions and equipment availability. Accordingly, we believe this Technical Specification provision has been previously addressed in our February 14, 1983 submittal.

Item 2 (SER Pg 14, Item 1 & 2)

"Also, there should be a Tech. Spec. on the surveillance requirements on the OPS. This should include:

1. A test performed to assure operability of the system (exclusive of relief valves) prior to each shutdown.

2. A test for valve operability, as a minimum, to be conducted as specified in the ASME Code Section XI.

Response:

1. System testing surveillance requirements were included in Table 4.1-1 (item 37) of our February 14, 1983 submittal. Specifically, the system is required to be tested within 31 days prior to entering a condition in which OPS is required to be operable. Accordingly, we believe that this requested Technical Specification provision has been previously provided.

2. As noted in the basis for Specification 4.I8 of our February 14, 1983 submittal, valve operability and cycling tests for the PORVs (PCV-456, PCV-455C) and MOVs (535, 536) associated with the OPS are performed in accordance with the requirements of 10 CFR 50.55a. As required by 10 CFR 50.55a a revised inservice testing program summary reflecting the periodic updating necessary for conformance with the applicable edition and addenda of the ASME B&PV Code

Section XI was submitted for NRC review and concurrence by letter dated February 16, 1984. The valves associated with the OPS are identified in that program summary and are required to be periodically cycled. Accordingly, we believe that this request has been previously addressed.

ATTACHMENT B

A. SER Pg. 3, first paragraph, second sentence:

The PORVs are described as gate valves; they are in fact, nitrogen operated globe valves.

B. SER Pg. 4, IV.A.1 Testability:

Technical Specification testing provisions have been previously proposed. (see Attachment A for response to specific requests)

C. SER Pg. 10, first paragraph, third sentence:

The statement that the licensee monitors SG/RCS ΔT by comparing the readings from thermocouples mounted on the external surface (metal) of each SG is incorrect. A description of the methods by which SG water temperature (and therefore SG/RCS ΔT) is determined, is presented on pg. 13 of the SER.

D. SER Pg. 10, second paragraph:

Protection against inadvertent mass addition from more than a single safety injection pump is afforded by administrative controls that require de-energizing the safety injection pumps (i.e., power removed by opening of circuit breakers); therefore, closing and locking or de-energizing the branch line stop valves, or the pump discharge valves on the SI header, are no longer required.