**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 30, 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:

Transmitted as Attachment A to this letter are requests for relief from five ASME B&PV Code Section XI system pressure testing requirements submitted as required by 10 CFR 50.55a (g). The provisions of these relief requests are intended for application during the current Indian Point Unit 2 Refueling and Inservice Inspection (ISI) outage. Accordingly your early review and approval are requested.

Additional relief requests may be submitted in the near future as the need for them develops based on our Inservice Inspection (ISI) activities during this outage.

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

Very truly yours,

John D. O'Toole



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Attachment A

# Requests for Relief from Certain Testing Requirements of ASME B&PV Code Section XI

Consolidated Edison Company of New York, Inc
Indian Point Unit No. 2
Docket No. 50-247
July, 1984

## Relief Request L*

1. Components for Which Relief is Requested

   (a) Name: Line segments of line Nos. 16 and 56 as identified below

   (b) Function: Safety Injection

   (c) ASME Section XI Code Class: 2

2. Reference Code Requirements That Have Been Determined to be Impractical

   Provisions of Section XI 74/S75 IWC-5220 which specify that the system hydrostatic test pressure required is 1.25 times the system design pressure.

3. Alternate Examinations

   The line segments identified below shall be visually examined for leakage during an inservice test per Section XI 80/W81, paragraph IWA-5211(c).

| Line No. | From Valve | To Valve |
|---|---|---|
| 16 | 851 B | 852 B |
| 56 | 851 A | 852 A |

4. Basis for Requesting Relief and Alternative Examinations

   Check valves 852 A and 852 B preclude pressurization of these line segments from the piping downstream of 852 A and 852 B. The piping upstream of valves 852 A and 852 B cannot be isolated from the safety injection pump discharge and suction lines. Therefore, line segments between 851 B - 852 B and 851 A - 852 A can only be pressurized from the pump side to maximum pump discharge pressure. A visual examination during an inservice test at maximum pump discharge pressure is considered sufficient to demonstrate continued pressure boundary integrity. The test pressure during the inservice test is anticipated to be about 1550 psig which is close to the test pressure - 1732 psig, which would otherwise be required based on 80/W81 provisions - 1.10 times lowest relief valve setting.

*Relief Requests A-F and G-K were transmitted to NRC by Con Edison letters dated May 11, 1984 and June 29, 1984, respectively.

## Relief Request M

1. Components for Which Relief is Requested

   (a) Name: Line segment identified below

   (b) Function: Chemical Volume and Control

   (c) ASME Code Class: 2

2. Reference Code Requirements That Have Been Determined To Be Impractical

   Provisions of Section XI 74/S75 IWC-5220 which specify that the system hydrostatic test pressure required is 1.25 times the system design.

3. Alternate Examinations

   The line segment identified below shall be visually examined for leakage during an inservice test per Section XI 80/W81 paragraph IWA-5211(c).

| Line No | From Valve | To Valve |
|---|---|---|
| 99 | 206 | PCV 135 |

4. Basis for Requesting Relief and Alternative Examinations

   Valve PCV 135 is a pressure regulating valve that separates line 99 (600 psig design) from downstream line 140 (150 psig design). Valve PCV 135 is designed for regulating flow but is not designed for isolation capability. It has a maximum design differential pressure of 600 psig and cannot be used to support the required pressure test of 750 psig on a portion of line 99 to valve 206. The line segment between valve 206 and PCV 135 will therefore be inservice tested with valve PCV 135 at maximum throttle position. It is anticipated that a test pressure of 600 psig will be applied to the line segment under these conditions.

## Relief Request N

1. Components for Which Relief is Requested

   (a) Name: Line segments identified below

   (b) Function: Chemical and Volume Control

   (c) ASME Code Class: 3

2. Reference Code Requirements That Have Been Determined to be Impractical

   Provisions of Section XI 74/S75 IWC-5200 (a) which specify that the system hydrostatic test pressure required is 1.10 times the system design.

3. Alternate Examinations

   The line segments identified below shall be visually examined for leakage during hydrostatic tests performed in conjunction with Holdup tanks 21, 22 and 23, per Section XI 80/W81 IWD-5223.

| Line No. | From Valve | To Valve |
|---|---|---|
| 718 | 4022 | 4019 |
| 718 | 4023 | 4020 |
| 718 | 4024 | 4021 |

4. Basis for Requesting Relief and Alternative Examinations

   Two inch check valves 4019, 4020 and 4021, preclude pressurization of these line segments from the downstream side piping. The piping immediately upstream of valves 4022, 4023 and 4024, connect directly to Holdup Tanks and can only be tested in conjunction with the Holdup Tank Tests. The line segments will therefore be visually examined during hydrostatic tests of the Holdup Tanks based on Section XI 80/W81 IWD-5223 provisions.

## Relief Request O

1. Components for Which Relief is Requested

   (a) Name: Line segments identified below

   (b) Function: Chemical and Volume Control

   (c) ASME Section XI Code class 2

2. Reference Code Requirements That Have Been Determined to be Impractical

   Provisions of Section XI 74/S75 IWC-5220 which specify that the system hydrostatic test pressure required is 1.25 times the system design pressure.

3. Alternate Examinations

   The line segment identified below shall be visually examined for leakage during a hydrostatic test conducted in conjunction with line segment 741 upstream of valve 4051 in accordance with Section XI 80/W81, paragraph IWC-5222. Additionally, the subject line segment shall be visually examined for leakage during an inservice test per Section XI 80/W81, paragraph IWC-5221, conducted in conjunction with the line segment 741 downstream of valve 4053.

| Line No. | From Valve | To Valve |
|---|---|---|
| 741 | 4051 | 4053 |

4. Basis for Requesting Relief and Alternative Examinations

   Two inch check valve 4053 precludes pressurization the subject line segment from the downstream (2500 psig nominal design) piping. Two inch valve 4051 isolates the 2500 psig piping from 2" 150 psig piping. The only way to pressurize the subject line segment is from the piping upstream of valve 4051. Therefore, the line segment will be visually examined during a hydrostatic test per 80/W81 IWC-5222 performed on the piping upstream of valve 4051. Additionally, a visual examination of the line segment conducted during an inservice test on piping downstream of valve 4053 will provide further evidence of the line segment integrity.

## Relief Request P

1. Components for Which Relief is Requested

   (a) Name: Various

   (b) Function: Various

   (c) ASME Section XI Code Class: 1,2,&3

2. Reference Code Requirements That Have Been Determined to be Impractical

   Provisions of Section XI 74/S75 IWA-2400 (a) which specify that inspection intervals may be extended by one year, concurrent with plant outages and may also be extended for one year or more for plants that are out of service continuously for at least one year.

3. Alternate Examinations or Provisions

   The provisions of Section XI 80/W81 IWA-2400 (b) and (c) shall be utilized for determining the 1st inspection interval in lieu of the comparable 74/S75 provisions.

4. Basis for Requesting Relief and Alternative Examinations or Provisions

   Later Code editions have recognized the need for increased plant scheduling flexibility for performing examinations and tests. Specifically the 80/W81 code provisions permit extensions of one year to the inspection interval without necessarily requiring these extensions to be concurrent with plant outages. Additionally, the provisions allow extensions of the interval in the event that the plant is shutdown continuously for six months or more. In the case of Indian Point Unit 2 an extended outage of more than 6 months occurred from October, 1980 to May, 1981. The 80/W81 provision would optionally permit extending the inspection interval because of that long outage. We will attempt to complete the 1st interval examinations and tests during the current outage; however, in the event that these examinations and tests cannot be performed in a timely manner, we will use the 80/W81 provisions to extend the interval. It is anticipated that if these provisions are invoked, it will not have a significant impact on the overall examination and testing schedule since in most cases the required examinations and tests have progressively been accomplished over the past 10 years.