John D. O'Toole
Vice President

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

August 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:

Transmitted as Attachment A to this letter are two requests for relief from ASME B&PV Code Section XI requirements submitted pursuant to 10 CFR 50.55a(g) for the first ten year interval. Relief request G supersedes a previous request submitted by letter dated June 29, 1984 relative to the examination of reactor vessel flange ligaments between threaded stud holes. Relief request Q is a new request concerning the hydrostatic pressure testing of diesel generator coolers associated with testing of the service water system.

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

Very truly yours,

John D. O'Toole

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

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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
August, 1984

RELIEF REQUEST G Rev. 1*

1. Components for Which Relief is Requested

(a) Name: Reactor Vessel Flange Ligaments between threaded stud holes.

(b) Function: Reactor Vessel Head to Flange Closure

(c) ASME Section XI Code Class: 1

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

Provisions of Section XI 74/S75 Table IWB-2600 item B1.9-volumetric examination of ligaments between threaded stud holes, 100% required in 10 years.

3. Alternative Examinations

Provisions of Section XI 74/S75 Table IWB-2600 item B1.9 will be applied during the first inspection interval to 46 of 54 reactor vessel flange ligament areas in lieu of 54 of 54 ligaments, and 100% of vessel flange stud holes will be visually examined. The 8 ligament areas not inspected during this inspection interval will be targeted for earlier inspection during the next first and second 40 month inspection period.

4. Basis for Requesting Relief and Alternate Examinations

Two reactor vessel guide studs are required to remain in place prior to, during and after the automated reactor vessel examination to assure proper alignment during removal and replacement of the reactor head, internals and inspection tool. The placement of each of the guide studs precludes automated inspection of three ligament areas around and adjacent to each guide stud (6 total).

During the vessel ligament inspections it was determined that the ligament area around stud hole 14 also could not be volumetrically examined as scheduled because an interference with one of the tool support legs precluded local access for the transducer plate which is utilized for this examination. Additionally after inspections of the ligament area were completed it was determined by a review of records that the ligament area around stud hole 7 was not inspected as scheduled during a 1978 examination and was not subsequently rescheduled for examination. It is believed that interference with a tool leg also precluded this examination.

Consideration was given to inspecting these ligament areas during this inspection sequence; however it was determined that such an examination was impractical and unwarranted for the following reasons:

1. The satisfactory inspection of 46 of 54 ligament areas demonstrate the overall integrity of these areas.

2. The two installed guide studs limit access for examination to 6 of 8 ligament areas.

3. Inspecting the remaining 2 of 8 ligament areas would require a major restructuring of the inspection tool involving removal from the vessel and relocating guide stud bushings, leg locations and transducer plate arrays. It is estimated that this evolution including inspection time would expend 20 hours on the plant critical path schedule which is estimated to be equivalent to five hundred thousand dollars of replacement power costs.

4. The inspection of 2 of 8 ligaments would require an expenditure of an estimated 2.5 man rem due partially to the fact that some of the work activity in restructuring the tool would be accomplished in areas adjacent to the upper internals storage.

   Considering that 46 of 54 ligaments have already been inspected and only 2 of 8 could be further inspected the overall expenditure of critical path time and personnel exposure does not warrant these additional inspections at this time.

* This relief request supersedes Relief Request G which was originally transmitted to NRC by Con Edison letter dated June 29, 1984. This revision provides clarifying information relative to the original request and provides information related to additional ligament areas.

RELIEF REQUEST Q

1. **Components for Which Relief is Requested**

   (a) Name: Service Water System - Diesel Generator Coolers

   (b) Function: Heat Removal from Diesel Generator Oil

   (c) ASME Section XI Code Class: 3

2. **Reference Code Requirements that Have Been Determined to be Impractical**

   ASME Section XI 74/S75 IWD-5000 which specifies that system pressure tests shall be at least 1.10 times the system design pressure.

3. **Alternate Examinations**

   The Diesel Generator Coolers will be tested at 142 psi in lieu of 165 psig (1.10 times service water system design pressure) as specified by IWD-5000.

4. **Basis for Requesting Relief and Alternate Examinations**

   In accordance with the manufacturer's operating manual, operation of the equipment is precluded at conditions which exceed component name plate data. In the case of the coolers, maximum permissible pressure is limited to 150 psig. Discussion with the supplier indicated that if this pressure was exceeded, the equipment would potentially be degraded.

   To preclude potential equipment degradation, the diesel cooler pressure test was established at 142 psig (6% less than 150 psig) with the test relief valves set at 150 psig to provide for a test operating range.

   The 142 psig test is more than sufficient to demonstrate component integrity because it significantly exceeds normal operating pressure and also exceeds maximum possible pressure potentially resulting from service water pump shut off head. Specifically the normal operating pressure is only 60-80 psig and maximum pump shut off head is 137 psig.