

John D. O'Toole
Vice President

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

November 19, 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:

Transmitter as Attachment A to this letter is a request for relief from ASME B&PV Code Section XI pressure testing requirements submitted pursuant to 10 CFR 50.55a(g) for the first ten year interval. This request is necessary due to the piping design of the containment spray system which precludes isolating and pressurizing a portion of the system to the code required pressure.

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

Very truly yours,



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

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Attachment A

Request For Relief From ASME
B&PV Code Section XI
System Pressure Testing Requirements

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
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Relief Request R

1. Components for Which Relief is Requested

- (a) Name: Line segments identified below
- (b) Function: Containment Spray
- (c) ASME Section XI Code Class: 2

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

Provisions of Section XI 74/75 IWC-5200 (a) Which specify that the system hydrostatic test pressure required is 1.10 times the system design pressure.

3. Alternate Examinations

The line segment identified below shall be visually examined during an inservice test of Containment Spray Pump No. 21, during which the line segment will be subjected to pump discharge.

| <u>Line No.</u> | <u>From Valve</u> | <u>To Valves</u> |
|-----------------|-------------------|------------------|
| 51 | 867A | 866A and 866B |

4. Basis for Requesting Relief and Alternate Examinations

Check valve 867A precludes pressurization of this line segment from upstream of valve 867A. The design pressure of the line upstream of valves 866A and 866B preclude pressurizing this line segment to 1.10 times its design pressure. The line segment will therefore be visually examined during an inservice test of Containment Spray Pump No. 21, during which the line segment will be subject to pump discharge pressure.