John D. O'Toole
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July 19, 1985

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:

Our letter of December 12, 1984 provided a schedule for submitting a response to your letter of November 26, 1984, in which you identified differences between our proposed snubber Technical Specifications and the NRC model Standard Technical Specifications. Attachment A to this letter contains our response to those differences. It is our intention to revise our proposed Technical Specification amendment submitted May 30, 1984 to incorporate the information contained in Attachment A to this letter and resubmit it by October 31, 1985.

If you have any further questions on this matter, do not hesitate to call.

Very truly yours,

John D. O'Toole

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ATTACHMENT A

Response to NRC's November 26, 1984 Request for a Resolution of Identified Differences in the Proposed Snubber Technical Specification for Indian Point Unit No. 2

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
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Item A: Section 4.7.9 of the STS requires that each snubber shall be demonstrated operable by an augmented inservice inspection program schedule and the requirements of Specification 4.0.5. The licensee's proposed TS 4.12(A) does not include the STS statement for demonstrating snubbers operable by an augmented inservice inspection program nor requirements equivalent to STS 4.0.5.

In addition, TS 4.12(A) includes paragraph one ("All hydraulic snubbers.....") and five ("In addition,....") which are inconsistent with the STS.

Response: The proposed Technical Specification 4.12(A) includes inspection requirement statements which meet the intent of Standard Technical Specification 4.7.9 requiring an augmented inservice inspection program. The requirements equivalent to Standard Technical Specification 4.0.5 are not referenced since our Technical Specifications do not contain any specification similar to 4.0.5.

The proposed Technical Specification 4.12(A), paragraph one ("All hydraulic snubbers....."), will be revised to state the following: "Snubbers .....", which meets the intent of the Standard Technical Specifications.

Proposed Technical Specification 4.12(A), paragraph five ("In addition,...."), refers to twenty four steam generator snubbers installed with external reservoirs and tubing. Each steam generator is supported by six (6) snubbers; four (4) at an upper elevation (i.e. El. 90' and El. 92')and two (2) at a lower elevation (i.e. El. 46') .

One (1) remote reservoir with approximately 140 ft. of interconnected tubing controls the four (4) snubbers located at the upper elevation and a second remote reservoir with approximately 50 ft. of interconnected tubing controls the two snubbers located at the lower elevation. The remaining snubbers, which are located on the piping systems, each have an integral reservoir. Since the twenty four steam generator snubbers are the only ones with a remote reservoir design, they should be visually inspected independently of the other snubbers. This has already been reviewed and accepted by the NRC in Amendment No. 62 to the Technical Specifications. The proposed Technical Specification will be revised to clarify that this is an additional group of snubbers.

Item B: Section 4.7.9 of the STS requires that all subsequent inspection intervals shall be defined for visual inspection. Specific wording in the STS visual inspection table heading is "no. operable snubbers per inspection period". The licensee's proposed TS 4.12(A) visual inspection table heading uses the wording "inspection or during" in the table heading.

In addition, the STS requirements pertain to all snubbers and state that the provisions of STS 4.0.2 are not applicable. The licensee's proposed TS 4.12(A) only includes "all hydraulic snubbers whose seal material has been demonstrated by operating experience..." and does not reference the equivalent of STS 4.0.2 (e.g., TS Definition 1.10, Surveillance Interval Maximums).

Response: The visual inspection table heading in proposed Technical Specification 4.12(A) will be revised to include the specific wording of the Standard Technical Specification visual inspection table heading (e.g., "no. inoperable snubbers per inspection period"). The proposed Technical Specification 4.12(A) will also be revised to include a footnote to indicate that the provisions of section 1.10 are not applicable to the visual inspection period.

Item C: Section 4.7.9(b) of the STS states that open fluid ports shall be a cause for inoperability. The licensee's proposed TS 4.12(A) does not discuss this subject.

NOTE: The following wording has been approved for NTOL's:

"When a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined operable via functional testing unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction."

This wording is acceptable if the TS is to contain a functional test provision to determine operability.

Response: The proposed Technical Specification 4.12(A) will be revised to include the following Standard Technical Specification wording: "However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable, and cannot be determined operable via functional testing for the purpose of establishing the next visual inspection period unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction."

Item D: Section 4.7.9(c) of the STS requires that functional tests shall be performed at least once every 18 months during plant shutdown. The licensee's proposed TS 4.12(B) states "once each refueling cycle" for surveillance frequency.

Response: The applicable wording in proposed Technical Specification 4.12(B) will be revised to read "once each refueling outage, with the provisions of Technical Specification 1.10 applicable" which meets the requirements of the Standard Technical Specification 4.7.9(c).

Item E: Section 4.7.9(c) of STS requires that 10% of each type of snubber shall be tested in place or in a bench test. The licensee's proposed TS 4.12(B) states that a representative sample of 10 hydraulic snubbers or 10%..., whichever is less.

Also the proposed TS contains an exemption for testing snubbers > 50,000 lb. capacity.

> NOTE: If a reasonable time delay interim exemption is needed for testing snubbers of > 50,000 lb. capacity, it should be requested and the reasons for the interim exemption (e.g., to obtain larger capacity test equipment, etc.) should be provided. The proposed TS should define the end date of the exemption so it will be self-cancelling.

Response: The proposed Technical Specification 4.12(B) states "a representative sample of 10 hydraulic snubbers or 10%..., whichever is less." This sample size is justified since Indian Point Unit No. 2 has only one "type" of snubber, whereas most other plants have many "types", each of a relatively small family. Ten snubbers is considered to be a good representation of a particular family of snubbers, and a test population of such a size also keeps man-rem exposure for snubber testing within the guidelines of ALARA.

The proposed Technical Specification 4.12(B) will be revised to define "prior to startup from the end of the next complete refueling cycle following the issuance of this amendment" as the end date for exemption of testing snubbers greater than 50,000 lb capacity , in order to obtain larger capacity test equipment.

Item F: Section 4.7.9(c) of the STS requires that for each snubber that does not meet the functional test acceptance criteria an additional 10% of that type of snubber shall be functionally tested. The licensee's proposed TS 4.12(B) states "10 hydraulic snubbers or 10%" and "whichever is less".

Also, the functional test acceptance criteria of STS 4.7.9d is not specifically mentioned.

Response: See Item E for justification of the proposed Technical Specification 4.12(B) statement "10 hydraulic snubbers or 10%" and "whichever is less".

The proposed Technical Specification 4.12(B) will be revised to specify that the acceptance criteria of proposed Technical Specification 4.12(C) are applicable.

Item G: Section 4.7.9(c) of the STS requires that snubbers identified as "especially difficult to remove" or in "high radiation zones during shutdown" shall be included in the test sample. The licensee's proposed TS 4.12(B) does not discuss this subject.

Response: The proposed Technical Specification 4.12(B) will be revised to state that "Snubbers identified as 'especially difficult to remove' or in 'high radiation zones during shutdown' shall also be included in establishing the representative samples."

Item H: Section 4.7.9(c) of the STS requires retesting of previously failed snubbers and replacements. The licensee's proposed TS 4.12(B) does not discuss this subject.

Response: A failed snubber is either repaired or replaced with a snubber that meets the acceptance criteria. After the snubber is repaired, it is retested functionally to meet the acceptance criteria and placed in service only if the acceptance criteria are met. Re-testing of these snubbers should only be due to there random selection for the test sample. The unnecessary re-testing of these previously repaired and retested snubbers will also unnecessarily increase man-rem exposure.

Item I: Section 4.7.9(c) of the STS requires testing of all snubbers when any one failed and was determined generic. The licensee's proposed TS 4.12(B) does not discuss this subject.

Response: The proposed Technical Specification 4.12(B) will be revised to include the following statement:

"If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated, and if found to be caused by a manufacturer or design deficiency, all snubbers of the same manufacturer and model which are susceptible to the same defect and located in a similar environment shall be functionally tested."

Item J: Section 4.7.9(f) of the STS requires snubber service life monitoring. The licensee's proposed TS 4.12(D) contains a footnote which is not consistent with the STS.

Response: The proposed Technical Specification 4.12(D) will be revised to delete the footnote.

Item K: Section 3/4.7.9 Bases of the STS describes the reasons for specifying operability and surveillance requirements for snubbers. The licensee's proposed TS Basis is not consistent with the STS wording.

Response: The proposed Technical Specification Basis will be revised to be consistent with the proposed shock suppressor (snubbers) Technical Specification.