

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 30, 1985

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Hugh L. Thompson, Jr.
Director Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

Attachment A to this letter contains Con Edison's evaluation of the degree of compliance of Indian Point Unit No. 2's design basis to the guidance contained in Regulatory Guide 1.97, Revision 2. The attached evaluation has been performed in accordance with the Program Plan provided in our August 28, 1984 letter and the schedule provided in our April 15, 1983 response to NUREG-0737, Supplement 1.

In accordance with the Attachment to your letter of March 11, 1985 we will submit a schedule for the implementation of the modifications identified in Attachment A, Sections 2.0 and 3.0 by December, 1985.

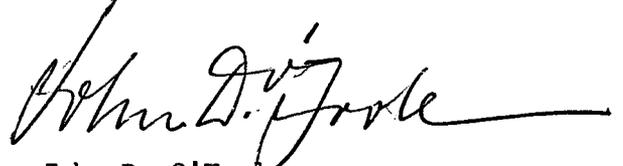
Appendix I to the report in Attachment A contains our response to Mr. Varga's May 3, 1984 and February 6, 1985 letters regarding Inadequate Core Cooling Instrumentation (ICCI). In the February 6, 1985 letter we were asked to discuss the benefits of combining item II.F.2 of NUREG-0737 with our Reg. Guide 1.97, Rev. 2 evaluation for Supplement 1. During the ICCI review we recognized the need to make certain plant upgrades, and to properly integrate them with our Supplement 1 program. In fact, this integration was suggested in Mr. Eisenhut's letter of December 10, 1982 on ICCI (Generic Letter 82-28). Therefore, in coordinating the Reg. Guide 1.97, Rev. 2 evaluation with the ICCI requirements we achieved close integration of the Supplement 1 initiatives and effective utilization of Con Edison resources, while at the same time deriving an optimum set of plant upgrades for improved post accident monitoring.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "John D. O'Toole", with a long horizontal flourish extending to the right.

John D. O'Toole
Vice President

cc: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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