John D. O'Toole
Vice President

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

October 13, 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:

On June 26, 1984 the Commission amended its regulations to require improvements in the design and operation of light water cooled nuclear power plants to reduce the likelihood of failure of the reactor protection system to shutdown the reactor following anticipated transients and to mitigate the consequences of anticipated transient without scram (ATWS) events. Specifically, for Westinghouse designed nuclear steam supply systems the new rule (10 CFR 50.62) requires the installation of equipment, diverse from the reactor trip system, which will automatically initiate auxiliary feedwater and initiate a turbine trip under conditions indicative of an ATWS event.

The rule requires licensees to submit a proposed schedule for implementing the new requirements 180 days following NRC's issuance of QA guidance for non-safety-related components. That guidance was issued April 16, 1985; therefore, the proposed schedule is due for submittal by October 13, 1985.

As a member of the Westinghouse Owners Group (WOG), Consolidated Edison is participating in the WOG ATWS Mitigating System Actuation Circuitry (AMSAC) generic design program. The WOG AMSAC generic design program is intended to satisfy the requirements of 10 CFR50.62. The results of the WOG program, contained in WCAP-10858 "AMSAC Generic Design Package" were submitted for NRC review and approval by the WOG, in letter OG-156, on July 25, 1985. The package contains conceptual designs for three logic

8510220226 851013
PDR ADOCK 05000247
P PDR

A055
1/0

alternatives; each will sense conditions indicative of an ATWS event when a loss of heat sink has occurred but will not actuate until after the reactor protection signals should have been generated.

Based on our review of the three conceptual logic alternatives contained in WCAP-10858, Logic 1 (AMSAC Actuation on Low Steam Generator Water Level) is our first preference followed closely by Logic 2 (AMSAC Actuation on Low Main Feedwater Flow). We believe each of the three logic alternatives will provide ATWS mitigation capability consistent with that required by the rule. The final logic selection then, will depend in part on such factors as susceptibility to spurious actuation, ease of integration into the existing design, capital and operating costs determined at the detailed design stage and design approval as described in WCAP-10858.

The proposed schedule for implementation of the rule is based in part upon the completion of the Staff's review of the WOG's AMSAC generic design package. A period of approximately eighteen (18) months will be necessary following receipt of the Safety Evaluation Report (SER) to allow for detailed design of the system (six months) and procurement of materials (12 months). This is provided that the staff does not require a plant-specific design review prior to implementation. Con Edison plans to submit a description of the final design and implementation schedule within six months of receipt of the SER. It is expected that the system would then be installed during the first scheduled refueling outage after this eighteen month period. Note that this schedule could put final implementation beyond the target date identified in the rule (i.e., the second refueling outage commencing after July 26, 1984).

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

Very truly yours,

John D. O'Toole

John D. O'Toole
Vice President