

John D. O'Toole  
Vice President

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

December 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, Project Director  
PWR Project Directorate No. 3  
Division of PWR Licensing-A

Dear Mr. Varga:

Your letter of November 8, 1985 requested additional information regarding our April 10, 1985 license amendment application concerning changes to the total nuclear peaking factor ( $F_q$ ) limit, accumulator inventory, and allowable steam generator tube plugging. The requested information was provided during a telecon between our respective staffs on December 10, 1985 and is confirmed as follows:

At Indian Point 2 (IP-2) the current level of tube plugging is as follows:

Steam Generator No.	21	22	23	24
Percent of Tubes Plugged	4.6	6.1	4.2	5.5

As can be seen, the steam generators at IP-2 are essentially plugged uniformly. This has been and is anticipated to be the experience at IP-2. Your staff correctly assumed that the 25% tube plugging limit requested is meant to be the maximum for any steam generator.

The proposed change to the  $F_q$  limit is based on the submitted revised LOCA analyses with 25% steam generator tube plugging. This new  $F_q$  has no impact on non-LOCA analyses since they are performed using a higher  $F_q$  value.

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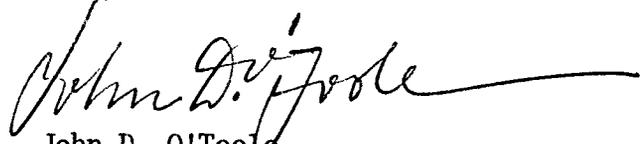
ADD: AD - J. KNIGHT (ltr only)  
EB (BALLARD)  
EICSB (ROSA)  
PSB (GAMMILL)  
RSB (BERLINGER)  
FOB (BENAROYA)

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At IP-2 the double-ended cold-leg guillotine break is the most severe break from a loss of coolant standpoint. The subject submittal has shown that for this break, the acceptance criteria as presented in 10 CFR 50.46 are met. In addition, the peaking factor assumed in the currently applicable small break LOCA analyses is unchanged by the subject submittal and remains valid. Finally, small break LOCAs are not sensitive to steam generator tube plugging levels on the order of the subject request. Therefore, the small break LOCA does not require any reanalysis.

Should you or your staff have any further questions, please do not hesitate to call.

Very truly yours,

A handwritten signature in cursive script, reading "John D. O'Toole", with a long horizontal flourish extending to the right.

John D. O'Toole  
Vice President

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