

John D. O'Toole
Vice President

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

January 9, 1986

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, Director
PWR Project Directorate #3
Division of PWR Licensing - A

Dear Mr. Varga:

This supplements our October 30, 1984 response to Generic Letter 84-15 dated July 15, 1984, entitled "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability."

At the time of our October 30, 1984 response to Generic Letter 84-15 Con Edison was required by NRC, under a Confirmatory Order dated February 11, 1980, to conduct the program testing described in our response. NRC has subsequently rescinded that requirement by the rescission of the Confirmatory Order (see Rescission of Order signed by D.G. Eisenhut dated July 5, 1985).

In addition to NRC's interest in programs to reduce cold fast-start surveillance tests, recent industry experience indicates that the Regulatory Guide 1.108 approach to diesel generator testing may lead to results which do not accurately reflect diesel generator availability. In view of the rescission of the requirement to apply Regulatory Guide 1.108 at Indian Point Unit No. 2 (IP-2) and recent industry experience with its continued applicability, we have revised our diesel generator test program to follow solely the requirements of the IP-2 Technical Specifications.

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

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Very truly yours,

John D. O'Toole

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

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Add:

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