

John D. O'Toole
Vice President

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January 24, 1986

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

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

Dear Mr. Thompson:

This letter revises our previous commitments concerning the Safety Assessment System/Safety Parameter Display System (SAS/SPDS) at Indian Point Unit No. 2 (IP-2) and requests revision of the June 12, 1984 Order confirming our prior commitments. You will recall that that Order confirmed December 31, 1986 as the date for full operation/training for SAS/SPDS. However, as discussed below, a change in that date to April 30, 1988 is necessary.

In our letter of October 4, 1984 (J.D. O'Toole to D.G. Eisenhut) we informed you that, due to unforeseen problems encountered with our original SAS/SPDS contractor, we were forced to terminate the contract. At that time we were initiating procurement from another vendor. Since then we have re-evaluated our program for implementing SAS/SPDS and considered different options. On January 25, 1985 we contacted the NRC Staff regarding our implementation of SAS/SPDS and sought guidance on the basic SPDS requirements of NUREG-0737, Supplement 1 in order to fully assess the different options. We have elected to continue with the implementation of SAS/SPDS and have awarded a new contract to an experienced vendor.

The original contractor's problems which led to contract termination were beyond our control, and have had a significant impact on Con Edison resources, priorities, and the SAS/SPDS implementation schedule. As noted in our April 15, 1983 and March 12, 1984 submittals, several SAS/SPDS activities were to be accomplished during and after installation of the basic system. This was due to the fact that we had frozen the SAS/SPDS design at an early stage and had selected a contractor by the time our April 15, 1983 response to NUREG-0737, Supplement 1 was submitted. We recognized then that other Supplement 1 activities would impact SAS/SPDS and that an integrated assessment would have to be made

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with the basic system being upgraded accordingly. This was included in our original SAS/SPDS implementation plan; however, since many key milestones in our Supplement 1 implementation program are now completed, and SAS/SPDS is no longer ahead of those milestones, we took the opportunity in the period between contract termination and award of a new contract to upgrade the SAS/SPDS specification to more closely reflect its plant-specific integration with other Supplement 1 initiatives (mainly Emergency Operating Procedure (EOP) implementation). This action obviates the need for an integrated SAS/SPDS assessment and upgrade after installation of the basic system. In fact, the development of the revised SAS/SPDS has included significant operator/operations staff involvement and a close meshing of our upgraded EOPs with the SAS/SPDS. Thus, with these changes and additions to the original basic SAS/SPDS package, when SAS/SPDS is installed and all testing completed, it should be readily usable, together with the EOPs, to assist operators in diagnosing and monitoring the course of an accident.

Attachment 1 contains our revised implementation plan and schedule for SAS/SPDS. This plan and schedule supersedes our October 4, 1984 letter and the SAS/SPDS plan and schedule contained in our April 15, 1983 and March 12, 1984 submittals as confirmed by your Order dated June 12, 1984. We request that the June 12, 1984 Order be revised accordingly. The revised implementation plan and schedule are based on cost and engineering estimates with the scheduling of activities reflecting our management and resource capabilities and IP-2 fuel cycles. In addition, after examining the problems encountered with our original SAS/SPDS contractor, we have developed a schedule that factors in lessons learned from that experience, as well as a reasonable allowance for contingency around key testing and installation milestones. We believe that the attached plan and schedule are reasonable and achievable while not in any way compromising plant safety. The major factor supporting this conclusion is that we have implemented upgraded symptom-oriented EOPs in accordance with our Supplement 1 program goals and your June 12, 1984 Order. The completion of the EOP upgrade effort involved a large scope program which included: a) EOP development, b) Verification, c) Validation, d) extensive Operator training and e) Operator feedback into the final EOPs. The EOPs were implemented on September 20, 1985. Since Supplement 1 requires the operators to be capable of responding to accident conditions with and without the SPDS available, we believe our upgraded EOPs/Operator training provides sufficient interim action to allow completion of SAS/SPDS as proposed in Attachment 1.

If you or your staff have any questions on this matter, do not hesitate to call us.

Very truly yours,



John D. O'Toole
Vice President

cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
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