

John D. O'Toole
Vice President

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

June 12, 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: Ms. Marylee Slosson, Project Manager
PWR Project Directorate No. 3
Division of PWR Licensing - A

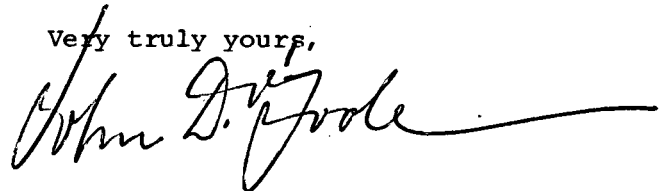
Dear Ms. Slosson:

By letter dated June 29, 1984 several requests for relief from the ASME B&PV Code Section XI requirements were submitted in accordance by 10 CFR 50.55a(g).

As a result of recent discussions with NRC Region I personnel one of the previously submitted requests, relief request J (Attachment A to this letter) has been revised. Relief request J, revision 1, identifies the anticipated personnel exposures required to perform examinations on the RHR heat exchangers, clarifies the limited access for examinations, and revises the frequency of visual examinations for leakage to once every refueling.

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

Very truly yours,



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

8606180246 860612
PDR ADDCK 05000247
P PDR

A047
1/1

ATTACHMENT A

Relief Request J - Revision 1

1. Component for Which Relief is Requested

- (a) Name: RHR Heat Exchangers 21 & 22
- (b) Function: Residual Heat Removal
- (c) ASME Section XI Code Class: 2

2. Reference Code Requirements That Have Been Determined to be Impractical

Provisions in Section XI 74/S75 IWC-2600

Item Cl.1, category C-A Circumferential Butt Welds, Volumetric examination.

Item Cl.2, category C-B, Nozzle to vessel welds, Volumetric examination.

Item Cl.3, category C-C, Integrally welded supports, surface examination.

3. Alternate Examinations

In lieu of the above examination requirements the RHR heat exchangers will be visually examined for leakage during the system leakage tests every refueling.

4. Basis for Requesting Relief and Alternate Examinations

Access for examination of the RHR heat exchangers circumferential welds, integrally welded supports and nozzle to vessel welds is precluded by a combination of insulation design and high radiation fields. Specifically the insulation was not designed for removal and replacement to support examinations. The Residual Heat Removal (RHR) heat exchangers are vertically mounted. The bottom head is insulated. The insulation is designed as essentially one unit supported by shaping the insulation around the inlet and outlet piping. Removing that portion of the insulation required for examination access will result in removing vertical support for the insulation on the head. Careful controlled removal of insulation will require erection of a work platform and work activity near the heat exchanger head where radiation fields are high. Based on recent surveys, fields are on the order of 100 R/HR on contact at the heat exchanger drain valves, 2-3 R/HR in the general area below the head the 0.5 to 1 R/HR general area near the head to shell weld.

The effort to provide temporary shielding; erect work platforms; remove the insulation; prepare the surfaces for examination; conduct the examinations; remove the temporary shielding; replace the insulation and disassemble the work platforms has been calculated to require an exposure of 10 man rem, which is equivalent to 1% of the total planned exposure for the recent outage.

Limited physical access precludes complete examinations of the welds and integral supports. Specifically the flange circumferential weld can only be ultrasonically accessed from the one side because of the flange design, and only an estimated 80% - 90% of the accessible side can be ultrasonically inspected because of interference with the integrally welded supports.

The integral supports also preclude ultrasonic access to 40% of the head to shell weld from one side.

Reinforcing rings completely preclude ultrasonic examinations of 100% of the nozzle to vessel welds.

Support beams preclude surface examinations of about 30% of the integral support welds from one side.

In view of the significant exposures involved in performing the examinations and the limited examination areas that can be accessed, performance of them is considered unwarranted.

As an alternate, visual examination for leakage will be accomplished for the RHR exchangers during system leakage tests every refueling.