

SUPPLEMENTAL SAFETY EVALUATION REPORT
DOCKET NO. 50-247
INDIAN POINT UNIT 2
GENERIC LETTER 83-28, ITEM 4.3
REACTOR TRIP BREAKER AUTOMATIC SHUNT TRIP

INTRODUCTION AND SUMMARY

Generic Letter 83-28 was issued by NRC on July 8, 1983, indicating actions to be taken by licensees based on the generic implication of the Salem ATWS events. Item 4.3 of the generic letter requires that modifications be made to improve the reliability of the reactor trip system by implementation of an automatic actuation of the shunt trip attachment on the reactor trip breakers. By letters dated November 4, 1983, March 15, 1984, April 2, 1984 and June 22, 1984, the licensee, Consolidated Edison of New York, Inc., provided responses to the plant specific questions identified by the staff in its August 10, 1983, Safety Evaluation Report on the generic proposed Westinghouse design. Subsequent to the review of the licensee's submittals, the staff issued a safety evaluation report on June 22, 1984 indicating the acceptable and unacceptable aspects of the licensee's responses and requested the licensee to further respond. By letter dated February 14, 1986, the licensee submitted further responses regarding the Technical Specifications and seismic qualification of the automatic shunt trip. We find the response to the seismic qualification issue to be acceptable, but are unable to accept the responses to the Technical Specification issues.

EVALUATION

The staff identified the following concerns in its safety evaluation report (SER) of June 22, 1984 and our evaluation of each is presented below.

- a) The seismic qualification of the shunt trip attachment is being conducted by the Westinghouse Owners Group (WOG). The licensee should confirm that the shunt trip is seismically qualified when the results of the WOG qualification program are completed.

By letter of February 14, 1986, the licensee advised us that the seismic qualification of the reactor trip breaker shunt trip attachment (model DB-50) had been completed by Westinghouse, that the Indian Point 2 plant specific seismic parameters were enveloped by the Westinghouse test results, and that 10 CFR 50.49 does not apply because the equipment is located in a mild environment. We find this acceptable.

- b) Following the implementation of the shunt trip modifications, the licensee should submit proposed technical specifications which are responsive to the staff requirements noted in the enclosed SER.

Subsequently, the staff issued Generic Letter 85-09 providing guidance for the Technical Specifications. The licensee has declined to implement this guidance in the following respects 1/.

1. The bypass breaker testing would not be included in the Technical Specifications.

1/. Letter from John D. O'Toole to Mr. Steven A. Varga, February 14, 1986.

2. The remaining surveillance test requirements would be administratively controlled on an interim basis without Technical Specification changes until the requirements can be optimally determined.

The above approach is unacceptable to the NRC staff. When a reactor trip breaker is tested, the reactor trip bypass breaker is put into service as a backup. The Generic Letter 85-09 Technical Specifications Guidance requires a manual test of the bypass breaker prior to putting it into service. This testing is a simple procedure and it is prudent to do this test before relying on this breaker as a backup to the remaining reactor trip breaker. The licensee states that probabilistic risk analyses (PRAs) show that testing of the breaker has an insignificant effect on the overall reliability. No claim is made that the reliability is decreased or that the bypass breaker is not safety related. Therefore, we believe that this test should be made as specified in Generic Letter 85-09.

Secondly, the licensee does not plan to amend its Technical Specifications until the requirements can be optimally determined. No schedule is given for such a determination. This is unacceptable to the NRC staff. The licensee should amend its Technical Specifications consistent with the guidance and requirements of Generic Letters 83-28 and 85-09. If further changes are then required in the interest of optimizing safety, the staff will consider further amendment requests.

CONCLUSION

Based on the above review, we find that the seismic qualification issue has been satisfactorily resolved. The licensee's position with respect to the Technical Specification issue is not acceptable. The licensee should submit proposed Technical Specifications consistent with Generic Letter 85-09 guidance for staff review.

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Docket File w/o encl.
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M. Slosson w/o encl.

June 16, 1986

DOCKET NO(S). 50-247

Mr. John D. O'Toole, Vice President
Nuclear Engineering and Quality Assurance
Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, New York 10003

SUBJECT: Indian Point Nuclear Generating Unit 2

The following documents concerning our review of the subject facility are transmitted for your information.

- ☐ Notice of Receipt of Application, dated _____.
- ☐ Draft/Final Environmental Statment, dated _____.
- ☐ Notice of Availability of Draft/Final Environmental Statement, dated _____.
- ☐ Safety Evaluation Report, or Supplement No. _____, dated _____.
- ☐ Notice of Hearing on Application for Construction Permit, dated _____.
- ☐ Notice of Consideration of Issuance of Facility Operating License, dated _____.
- ☐ Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards Considerations, dated _____.
- ☐ Application and Safety Analysis Report, Volume _____.
- ☐ Amendment No. _____ to Application/SAR dated _____.
- ☐ Construction Permit No. CPPR- _____, Amendment No. _____ dated _____.
- ☐ Facility Operating License No. _____, Amendment No. _____, dated _____.
- ☐ Order Extending Construction Completion Date, dated _____.
- ☐ Other (Specify) Bi-weekly Notice covering period June 4, 1986. Expiration date for hearing requests and comments July 7, 1986.

Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc:

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DATE➤	06/17/86						