

John D. O'Toole  
Vice President

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

July 31, 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, Project Director  
PWR Project Directorate No. 3  
Division of PWR Licensing-A

Dear Mr. Varga:

By letter dated February 16, 1984, and subsequent revision by letter dated July 18, 1986, we transmitted the "Inservice Testing Program Summary for the interval July 1, 1984 through June 30, 1994". Within the program summary submittal, we noted that should certain ASME B&PV Code Section XI requirements prove to be impractical due to unforeseen circumstances, subsequent relief from that requirement would be requested.

Such a circumstance has recently been identified. In accordance with the provision noted above, we are transmitting a new relief request as Attachment A to this letter. The provisions of this relief request have been implemented. Should the staff identify an acceptable alternative approach during the course of their review, we will consider implementing any such recommendation at that time.

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

Very truly yours,



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

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ATTACHMENT A

Inservice Testing Program Summary  
for the Interval  
July 1, 1984 through June 30, 1994

General Relief Request E

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
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GENERAL RELIEF REQUEST E

Systems: Various

Valves: All valves subject to stroke time test/acceptance criteria.

Function: As applicable for the specific valve subject to stroke time test/acceptance criteria.

Test Requirement: IWV-3417(a)

Basis for Relief:

Per IWV-3417(a), power operated valves exhibiting an increase in stroke time of 25% or more from the previous test for valves with full stroke times greater than 10 seconds or 50% or more for valves with stroke times less than or equal to 10 seconds shall have their test frequency increased to monthly until corrective action is taken. No provisions are made within the code to evaluate the cause of any such increase in stroke time. No provisions are identified in the code, at all, dealing with a decrease in stroke time. One particularly significant reason for a change in stroke time that is not indicative of valve degradation is the system condition (pressure, flow rate, etc.) between tests. If system conditions vary from test to test, valve stroke time will be affected.

Alternative Testing (Acceptance Criteria):

If a valve test indicates a change in stroke time sufficient to warrant a change in test frequency per IWV-3417(a), an analysis shall be performed to determine the cause of the stroke time difference. Items to be considered for such an analysis shall include: system conditions at the time of each test, manufacturer's information and valve stroke history. If after considering these factors and any other pertinent information, the stroke time deviation can be satisfactorily explained and documented, the test frequency need not be increased. If the valve has been stroke tested monthly and the above analysis indicates that the new stroke time is acceptable, test frequency may be revised to quarterly.