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May 8, 1987

Ms. Marylee Slosson, Project Manager
PWR Project Directorate No. 3
Division of PWR Licensing - A
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247

Dear Ms. Slosson:

By letter dated August 7, 1981, Consolidated Edison responded to NRC Generic Letter No. 81-14 "Seismic Qualification of Auxiliary Feedwater Systems", dated February 10, 1981. In that response, Consolidated Edison provided a brief overview of the Auxiliary Feedwater System (AFWS) and a description of the seismic design of that system. In response, NRC issued a Safety Evaluation Report (SER), dated September 7, 1982. That SER concluded that Consolidated Edison's auxiliary feedwater system has sufficient seismic capability to withstand a safe-shutdown earthquake and accomplish its safety function.

We recently performed an in-depth evaluation to determine the effectiveness of the IP-2 programs for maintaining AFWS operational reliability. This evaluation has disclosed the existence of incorrect information in our letter to NRC dated February 10, 1981. In the letter we stated that the pneumatic operators on the water regulator valves and steam inlet valve (PCV-1139) to the turbine driven auxiliary feedwater pump No. 22 are supplied by the instrument air system with an automatic high pressure nitrogen bottle backup system if the instrument air system supply to these valves should be interrupted. While the pneumatic operators on the water regulator valves have high pressure nitrogen backup capability, the steam inlet valve (PCV-1139) to turbine driven pump No. 22 is not backed up with an automatic high pressure nitrogen supply.

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Based upon our review, we have concluded that the absence of a nitrogen backup feature to PCV-1139 would not have precluded system operability during and subsequent to a seismic event. As stated in the NRC SER, the lower bound ground acceleration capacity of the water regulator valves and steam inlet valve is much greater than the design ground acceleration for the Plant. Even though Unit 2's instrument air system is seismic Class I, if for some reason the air supply is lost to PCV-1139, the valve conservatively fails open on loss of air supply. In addition, this valve may also be opened manually in the extremely unlikely event that the fail-safe designed pneumatic operator does not open PCV-1139. While we have concluded that the ability of PCV-1139 to withstand a SSE would not be compromised without the nitrogen backup feature, we are expeditiously developing a modification package and plan to install a nitrogen backup to PCV-1139 to enhance system reliability.

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

Very truly yours,

Murray Selman

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cc: U.S. Nuclear Regulatory Commission
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Mr. William Russell
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