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Vice President

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November 9, 1987

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

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Second Ten-Year Interval Inservice Inspection Program
Relief Request No. 26

By letter dated September 30, 1985, we submitted our ten-year Inservice Inspection Program for the second inspection interval (July 1, 1984 - June 30, 1994). Additional information in support of our program was submitted by letters dated July 17, 1987 and September 3, 1987. Attached is relief request No. 26 which supplements that program. The relief request demonstrates the impracticality of imposing the requirements of certain specific sections of ASME Section XI to Emergency and Temporary Repairs at Indian Point Unit No. 2 and provides an alternative method consistent with the Company's Quality Assurance Program Description, providing an equivalent level of plant safety to that resulting from ASME repair requirements. This submittal fulfills the commitment made in our October 20, 1987 letter, M. Selman, Consolidated Edison to W.V. Johnston, Region I. Pursuant to 10 CFR 170.12, Con Edison check No. E631396 for \$150.00 is enclosed.

If you have any questions, please do not hesitate to contact Mr. J. Del Percio, Manager, Regulatory Affairs.

Very truly yours,

Murray Selman

24.190.11.2.2

cc: Ms. Marylee M. Slosson
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RELIEF REQUEST 26

1. Components/Requirements for Which Relief is Requested

Relief is requested from applying the provisions of ASME Code Section XI Articles IWA-4000 and 7000, IWB-4000 and 7000, IWC-4000 and 7000, and IWD-4000 and 7000 as well as other Section XI articles which reference or invoke the requirements of the preceding articles for emergency repairs/replacements and temporary repairs/replacements.

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

The provisions of ASME Code Section XI Articles as identified in item 1 above have been determined to be impractical in some cases for application to emergency repairs/replacements and temporary repairs/replacements.

3. Alternate Requirements

In the event of an emergency condition (defined as a condition which, if not promptly corrected, could likely affect the health and safety of the public), the Vice President, Nuclear Power or his designated alternate(s) may authorize emergency repairs and/or replacements and deviations from the Articles of ASME Code Section XI identified above to effect the emergency repairs/replacements.

The following controls, taken from Station Policy SAO 204, will apply:

Emergency Repairs

Only the Vice President, Nuclear Power, or his designee, may authorize emergency repairs which because of their urgency cannot adhere to established review and control procedure. This authorization shall be obtained prior to the work being performed and should be in writing. Before emergency-repaired Class A, Class MET (Meteorological) or Class FP (Fire Protection) components are returned to service, the Vice President, Nuclear Power, or his designee shall be apprised of any complications involved in and the status of the repair. However, these restraints shall not deter the Operations Manager or Senior Watch Supervisor from initiating emergency repairs if clearly needed to protect site personnel or public safety. In such an instance, for repairs involving Class A, Class MET or Class FP components, the Vice President, Nuclear Power, or his designee shall be apprised of the circumstances of the repair as soon as practical. He may then determine the extent and nature of deviation from normal procedures and further corrective action to be taken.

In conjunction with performance of emergency repairs, an "Authorization for Emergency Repair" form shall be issued. This form shall be executed by the person(s) involved in the repair work.

An individual receiving oral authorization for emergency repair from the Vice President will sign the form and fill in the date and time. Use of this form along with the report described below complies with Corporate Policy. The form is then sent to the Manager, Nuclear Power Q.A. who shall request the Vice President to countersign the form. The Manager, Nuclear Power Q.A. shall send copies of the completed form to Director QA&R and the Chairman of the Nuclear Facilities Safety Committee.

The General Manager, NPG shall within 5 working days, submit a written report to the Manager, NPQA covering the following items:

1. Circumstances and basis for requiring the emergency repair.
2. A detailed description of the work performed under the authorization for emergency repair.
3. Identification of the procedural controls, material, or design requirements bypassed in completing the emergency repair.
4. Corrective action required to assure Licensing and Design requirements are met, such as safety evaluations, modifications, or temporary repair procedure reviewed by the Station Nuclear Safety Committee, drawings updated, etc.
5. Estimated time to restore plant to acceptable design condition.

In the event that a significant loss of unit capacity is anticipated imminently because of a condition which requires an immediate repair or replacement and compliance with all the provisions of ASME Code Section XI Articles identified above is not practical, the Vice President, Nuclear Power or his designated alternate(s) may authorize temporary repairs or replacements and waive specific provisions of the Articles with due consideration for public health and safety. The following controls will apply in this case:

Temporary Repairs

Temporary repairs may be performed subject to the following steps being taken prior to performing the work:

1. The temporary repair shall have been reviewed for 10CFR50.59 applicability by the General Manager, Technical Support or

his designated alternate for this activity. If necessary, a safety evaluation shall be performed.

2. A temporary repair procedure shall be written, approved by the Station Nuclear Safety Committee, and reviewed by Engineering.
3. The temporary repair and the target date for effecting final repairs shall be authorized by the General Manager, NPG.
4. The above authorizations and reviews shall be documented and a Work Order initiated in accordance with this policy statement.

The temporary repair shall be tracked and if final repairs have not been performed by the authorized target date, the responsible organization shall ensure the temporary repair is re-evaluated by Engineering for continued appropriateness for future operation and has concurrence of the Station Nuclear Safety Committee in the re-evaluation.

4. Basis for Requesting Relief and Alternate Requirements

Emergency Repairs/Replacements potentially related to the public health and safety and temporary repairs/replacements potentially related to imminent substantial loss of plant capacity have an important element of immediacy; time is of the essence.

The ASME Code Section XI Articles identified above are designed for a normal repair/replacement sequence, requiring for example conformance with a design specification, performance of repairs in accordance with a repair program, use of an authorized inspector, material conformances, new preservice baseline, etc. The immediate nature of emergency and temporary repairs/replacements may justify, in particular instances, accomplishing repairs/replacements without necessarily conforming to the provisions of the subject Articles. For example, available fittings of a mechanical nature (clamps) may prove suitable short term substitutes for weld repairs specified in the original Construction Code, prior notification of the authorized inspection agency may be impractical on Sunday at 2:00 AM; carbon steel may be a suitable short term replacement for unavailable stainless steel fittings; and system hydrostatic tests at elevated pressures may be impractical because of the location of the repair or replacement.

In such cases, and to protect the interest of the public health and safety and/or to preclude an imminent substantial loss of unit capacity, the alternate requirements specified above as appropriate will be applied only as necessary.

The alternate requirements specified above provide suitable controls to assure that the plant will continue to operate in a safe manner consistent with the paramount need to protect the public safety. Adequate senior management review (at the General Manager level) of the need to perform either an emergency or temporary repair is accomplished on an expedited basis.

Temporary repairs are reviewed to assure no unreviewed safety issues per 10 CFR 50.59 exist by the General Manager, Technical Support. As required, a formal safety evaluation is prepared. A temporary repair procedure is written, reviewed by the Station Nuclear Safety Committee, and concurred in by the appropriate Engineering representative. The nature of the repair and the date by which permanent repairs will be in effect are reviewed for adequacy by the General Manager of Nuclear Power Generation.

For emergency repairs, written documentation of the work performed must follow within 5 days of implementation via a report from the General Manager of Nuclear Power Generation to the Manager of Nuclear Power Q.A. In addition to a description of the repair, the report must identify all deviations from normal Company policies and procedures as well as the future actions required for conformance.

This relief request, if granted, will formalize the existing practices set forth above, which provide for technical and management review of all aspects of the repair including establishment of Code compliance.

There is no change anticipated in the overall level of plant safety as a result of applying the alternate requirements. These requirements have basically been in effect since original plant operation and are consistent with comparable controls identified in our QA Program Description item 3 of Table A. The QA Program Description with these controls has been consistently approved by the NRC, the most recent approval being per NRC letter from W. Johnston to M. Selman dated May 27, 1987. The controls specified herein will therefore provide a suitable level of plant safety consistent throughout its operating life.