Stephen B. Bram
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

March 1, 1988

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

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

SUBJECT: Inservice Testing (IST) Program for Pumps and Valves,
Second 120-Month Interval

Your letter dated November 20, 1987 transmitted the results of your review of the second 120-month interval inservice testing (IST) program and relief requests, granted relief (in part) from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (the Code) and imposed certain alternative testing. That letter also requested that Con Edison revise the Indian Point Unit No. 2 IST program in accordance with the NRC's Safety Evaluation Report (SER) and Contractor's Technical Evaluation Report (TER) which were enclosed therewith, and notify you in writing of the resolution within 30 days of our receipt of that letter.

Our letter dated December 16, 1987 informed the NRC staff that a review of the NRC's SER and Contractor's TER had commenced. This letter is written in response to your request that we notify you in writing of the resolution of our SER and TER review. Our comments are presented in Attachment I to this letter.

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

Very truly yours,

John A. Basile

Attachment

A047
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cc: Ms. Marylee M. Slosson
Project Directorate I-1
Division of Reactor Projects I/II
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. William Russell
Regional Administrator - Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, NY 10511

Attachment I

Con Edison's Response to NRC's SER and Contractor's TER Concerning IP-2's Inservice Testing (IST) Program for Pumps and Valves, Second 120-Month Interval

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
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1. Auxiliary Boiler Feedwater Pump No. 22
(Ref: TER Section 2.9.1.1)

Boric Acid Transfer Pumps No. 21 & No. 22
(Ref: TER Section 2.12.3.1)

Comment: We note that interim relief has been granted by the NRC until the next refueling outage. We will either install the requisite flow instrumentation on the mini-flow recirculation loops during the next refueling outage or submit further information in support of our relief request sufficiently in advance of the interim relief request approval expiration to allow NRC review.

2. Auxiliary Boiler Feedwater Pump City Water Suction Supply Valves CT-25, CT-28, CT-31
(Ref: TER Section 3.4.1.1)

Comment: We have implemented a sample disassembly/inspection program for these valves. One valve of this group will be disassembled and inspected each refueling outage until such time that a relief request to change the interval has been submitted to the NRC and approved.

3. Hydrogen Recombiner Gas Supply Check Valves 1879A, B and 1880A, B
(Ref: TER Section 3.6.1.1)

Hydrogen Recombiner Hydrogen Supply Check Valve 1881A, Oxygen Supply Valve 1881C, and Nitrogen Supply Check Valve 1881D
(Ref: TER Section 3.6.1.2)

Comment: These check valves will be added to test procedure PT-V24 entitled "Inservice Valve Tests." Testing of these valves will be done in accordance with IP-2's IST Program and NRC's SER.

4. Safety Injection System Accumulator Outlet Check Valves 895A, B, C, D
(Ref: TER Section 3.12.1.1)

Combined Low Pressure Safety Injection/Accumulator Discharge Check Valves 897A, B, C, D
(Ref: TER Section 3.12.1.2)

Comment: We have implemented a sample disassembly/inspection program for these valves. For purposes of this program these eight valves are considered as members of the same group from which we will inspect one valve each refueling outage. This position was discussed with NRC staff on October 22, 1987 and the NRC concurred with our position with certain qualifications. For the second ten-year IST interval, that program commenced with the disassembly and inspection of valve 897D during the cycle 7/8 refueling outage.

5. Charcoal Filter Fire Protection Supply Check Valves 879A, B
(Ref: TER Section 3.12.3.5)

Comment: We have implemented a sample disassembly/inspection program for these valves. A proposed Technical Specifications amendment has been submitted to the NRC which would permit removal of the charcoal from the Fan Cooler Unit Charcoal Filters. We intend to terminate the sample disassembly / inspection program upon the approval of the proposed amendment. Fire protection in not required once the charcoal is removed and, as such, these valves would no longer be required.

6. Recirculation Pump Discharge Check Valves 886A, B
(Ref: TER Section 3.12.2.6)

Comment: We have implemented a sample disassembly/inspection program.

7. Containment Building Ventilation Cooling Coil Service Water Supply Header Relief Valves SWN 42-1, -2, -3, -4, -5
(Ref: TER Section 3.13.1.1)

Comment: These valves were tested in accordance with Section XI, Paragraph IWV-3510 during the previous refueling outage.

8. Conventional Plant Equipment Service Water Supply Valves FCV-1111 and FCV-1112
(Ref: TER Section 3.13.2.1)

Comment: These valves are included in test PT-V24, and testing of these valves will be done in accordance with IP-2's IST Program. These valves will be added to the refueling interval Section XI test PT-R35 entitled "Inservice Valve Tests" to comply with the TER's conclusions.

9. General Relief Request "A"
(Ref: TER Section 3.14.1.1)

Comment: Our IST program submittal shall be revised to reflect that we have previously met and currently meet the requirements of Sections XI, Paragraphs IWV-3426 and IWV-3427.

10. General Relief Requests "E" and "F"
(Ref: TER Sections 3.14.5.1 and 3.14.6.1)

Comment: These relief requests have been removed from our IST program.

11. Miscellaneous
(Ref: TER Appendix D)

Comment: IP-2's IST program has been revised to correct the typographical errors noted in Appendix D of the TER. In addition, inconsistencies and omissions in the IST program noted in Appendix D will be resolved and internally documented. We do not plan on resubmitting these revisions and documented resolutions to the NRC.