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October 18, 1988

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

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Subcooling Margin Monitor (TAC 45141)

As discussed at our August 18, 1988 meeting, we previously indicated our intention to have in place by startup following our 1989 refueling outage, an upgraded core exit thermocouple system including Central Control Room (CCR) readout. The core exit thermocouple (CETC) system installation during this outage will satisfy that portion of the requirements of item II.F.2 (applicable to CETC) of NUREG-0737 and the post accident monitoring instrumentation requirements of NUREG-0737, Supplement 1.

In addition to the above system configuration, changes will be made to the original modification that will allow the CETC system to provide the operator with a qualified and redundant subcooling margin monitor (SMM). This will satisfy those requirements of item II.F.2 of NUREG-0737 that remain following implementation of NUREG-0737, Supplement 1.

In the interim, the presently installed single channel subcooling margin monitor, that is sufficiently rugged to withstand a Safe Shutdown Earthquake at Indian Point Unit 2, will be used as the primary instrumentation providing margin to saturation. The seismic adequacy was established by a recent engineering analysis of seismic testing done on the original equipment. As backup indication in the unlikely event of failure of the subcooling margin monitor, alternate methods exist to determine margin to saturation by means of: 1) Plant Process Computer using qualified RCS temperature and pressure and 2) manual determination using the RCS temperature and pressure, instruments and employing a graph presently in use and contained in the IP-2 graphs books.

Additionally, we have now chosen to use subcooling as the criteria for manual Reactor Coolant Pump (RCP) trip, as opposed to the current use of low Reactor Coolant System (RCS) pressure indication. This will be implemented with the current SMM. When the final SMM upgrade discussed above is implemented, it will allow us to take advantage of the multi channel SMM following the 1990 refueling outage. The complete RCP trip criteria item will be the subject of a future correspondence.

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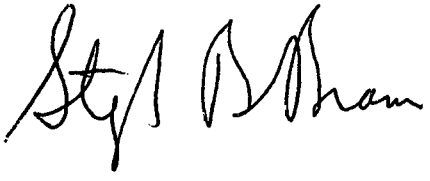
As soon as possible, but prior to December 31, 1988, procedure changes and training shall be accomplished in support of the RCP trip criteria changeover to subcooling using the existing CCR subcooling monitor and backup. The upgrade of the CETC System to include redundant SMM is scheduled for the 1990 refueling outage. This phased approach permits the immediate transition to subcooling as the RCP trip criteria, with the subsequent upgrade to the multi channel SMM imposing minimal operational impact.

If you have any questions on this matter, please contact Mr. Jude G. Del Percio Manager, Regulatory Affairs.

Very truly yours,



cc: Mr. William Russell
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