

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

February 17, 1989

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

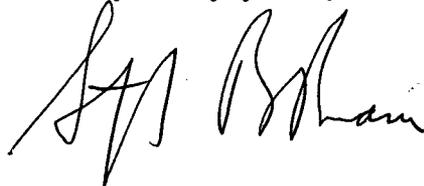
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Washington, DC 20555

SUBJECT: Generic Letter 88-14: Instrument Air System Evaluation

This letter transmits the response of Consolidated Edison Company of New York, Inc. ("Con Edison") to Generic Letter 88-14 which requests that NRC licensees verify certain aspects of the design, operation, maintenance, and training of personnel with regard to the Instrument Air Supply System and that system's interaction with safety-related equipment. The verification efforts performed by Con Edison are set forth in the attachment to this letter. The attachment also provides a schedule for completing loss of instrument air testing. Upon completion of this testing, we will provide you with the requested written notification that all actions set forth in the Generic Letter have been addressed.

Should you or your staff have any questions, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,



Attachment

cc: Mr. William Russell
Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1498

Ms. Marylee M. Slosson, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

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

Subscribed and sworn to
before me on this 21st
day of February, 1989.



ANTHONY R. ARNONE
Notary Public, State of New York
No. 4883047
Qualified in Westchester County
Commission Expires January 26, 1991

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Attachment I
Generic Letter 88-14

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
February, 1989

Consolidated Edison Company of New York, Inc. (Con Edison), is familiar with recent industry and NRC efforts regarding the effects of instrument air system failures on safety related equipment. In conjunction with these efforts, Con Edison has initiated a program intended to assure that the Indian Point Unit No. 2 Instrument Air System will meet the intent of its design and that the safety-related components and the safety-related portions of the system will function as required. This program includes implementation of a test procedure intended to assure that the applicable safety-related components will perform their intended safety-related function in the event of a loss-of-instrument air.

Con Edison response to NRC's specific verification requests set forth in the Generic Letter are provided below:

NRC GENERIC LETTER 88-14, ITEM 1

Verification by test that actual instrument air quality is consistent with the manufacturer's recommendations for individual components served.

RESPONSE

Con Edison has identified the manufacturer's recommendations for instrument air quality level for safety-related components. These recommendations for air quality level include dew point, cleanliness (particulate size), and whether or not oil content in the instrument air presents a threat to component internals. In response to NRC Generic Letter 88-14, Con Edison obtained and evaluated instrument air samples throughout the plant to verify that the air quality in the instrument air system meets the manufacturer's recommendations. The samples taken and their evaluation verify that the air quality in the instrument air headers meets the manufacturer's recommendations. To assure that air quality at Indian Point No. 2 remains consistent with the manufacturer's recommendations, Con Edison will expand its instrument air sampling program to include additional sample locations as well as samples for particulates and hydrocarbons. This, in combination with our existing preventive maintenance program on the major instrument air components, (Compressors, Dryers, etc.), will assure that proper instrument air quality is maintained.

NRC GENERIC LETTER 88-14, ITEM 2

Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air.

RESPONSE

Con Edison reviewed the manufacturer's recommendations for maintenance to be performed on the safety-related components served by the instrument air system and compared those recommendations with the preventive maintenance (PM) program at Indian Point Unit No. 2. The PM program was verified to be adequate to ensure that the safety-related equipment will function as intended on loss of I/A. The program was found to be consistent with the manufacturer's recommended maintenance program, with some minor differences noted.

Con Edison has also reviewed the emergency procedures and training given to personnel and found them to be adequate to address a postulated loss of instrument air and to ensure that safety-related equipment will function as intended.

NRC GENERIC LETTER 88-14, ITEM 3

Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function, including verification by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of the normal instrument air system. This design verification should include an analysis of current air operated component failure positions to verify that they are correct for assuring required safety functions.

RESPONSE

Consolidated Edison has conducted a review of the Instrument Air System to verify that the design is in accordance with its intended safety function. The following tasks were completed to accomplish this review:

1. Identification of safety-related components that upon loss of normal instrument air must fail in a position which accomplishes that component's safety-related function and verification of correct fail positions.
2. Identification of safety-related components that must perform safety-related functions after an assumed loss of instrument air. These components are those required to have a safety-related supply of air in the form of stored air in an accumulator and/or from a safety-related air/nitrogen supply.
3. Review and verification of the interfaces between the safety-related and non-safety-related parts of the instrument air system for proper isolation in the event of a loss of normal instrument air. This verification assures that the safety related supply of air is directed to the appropriate components and is not lost from the system.

The following tasks are schedule for completion by the end of the next refueling outage for Indian Point 2, currently scheduled to begin March 18, 1989.

1. With regard to the stored air in the various accumulators for safety-related components identified in Task 2 above that must perform safety-related functions after an assumed loss of instrument air, the following will be verified:
 - a. Capability of the stored air to supply the required number of safety-related functions.
 - b. Capability of accumulator stored air volumes to perform as designed with assumed leakages for the duration of a loss of instrument air event.

This verification will be performed in conjunction with Item 2 below.

2. Conducting a test program to demonstrate that the air-operated safety-related components will perform their safety-related function upon an assumed loss of normal instrument air. This test program, in addition to existing surveillance tests that will be completed during the March 1989 refueling outage, will demonstrate the following:
 - a. The safety-related component will fail in the position required to fulfill its safety-related function.
 - b. The leakage of check valves which provide isolation between the safety-related supply of air/nitrogen does not exceed the leakage assumed in the design.