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Vice President

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October 27, 1989
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: NRC Generic Letter 88-20: Initiation of the Individual Plant
Examination for Severe Accident Vulnerabilities

This is in response to Generic Letter 88-20, dated November 23, 1988, and its Supplement 1 dated August 29, 1989.

Indian Point Unit No. 2 has already been the subject of a detailed, comprehensive risk assessment, the Indian Point Probabilistic Safety Study, published in 1982. Subsequent amendments addressing specific issues were published in 1982 and 1983. This study was the result of a substantial effort (a total of more than 30 man-years for Indian Point Units 2 and 3) by a combined utility/contractor team and was subject not only to an extensive peer review process but also to an intense technical critique by the Commission, its contractors and numerous other organizations. The issues addressed in that study and the methodologies utilized were groundbreaking and in many respects continue to be reflective of those used today. The study uncovered vulnerabilities which were further evaluated and where appropriate, addressed by hardware and procedural changes (Reference: Letters dated March 5, 1982, January 21, 1983, and April 10, 1984, from J. O'Toole and J. Bayne to H. Denton). It is therefore Con Edison's intention to respond to Generic Letter 88-20 by adopting the probabilistic risk assessment (PRA) approach discussed in that Generic Letter. Given the substantial effort which the IPPSS embodies, it is our further intention to utilize that study to the maximum extent possible in our response.

Nevertheless, based on the guidance provided in NUREG-1335, we intend to re-evaluate certain portions of the IPPSS to determine the need to update and enhance the modelling techniques and methodologies used as well as to incorporate changes into the model, where appropriate, to reflect the current plant configuration and operator response procedures. We have identified a number of areas which we consider appropriate for such re-evaluation and would be pleased to discuss them with the staff at any point should you desire. It is our intention to perform the evaluation and any enhancements as a combined effort. We anticipate completion of the technical effort by the end of 1991, and preparation and submittal of our final response by June, 1992. Since, as discussed above, we intend to build upon our already completed and documented plant-specific PRA (IPPSS), we anticipate that some deviations from the format presented in NUREG-1335 may be appropriate.

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With specific respect to internal flooding, the IPPSS addressed such flooding both as a separate initiating event (IPPSS Section 7.4) and as a consideration in the fire analysis (IPPSS Sections 7.3.1 and 7.3.2). The conclusion of these analyses was that internal flooding was not a significant contributor to risk at the Indian Point 2 Station. Given the Indian Point 2 plant-specific PRA effort already completed on this issue and the resulting conclusion of low risk significance, our intended approach would be to avoid a separate and distinct effort and we would opt to revisit internal flooding as a coordinated task at the time we address external events. This approach will avoid significant inefficiencies and allow us to apply our resources most effectively.

In addition to requesting performance of an Individual Plant Examination, the Generic Letter encourages utilities to apply the results of the PRA process to areas of plant operation such as licensing and risk management. Con Edison has already begun to pursue such applications. Consequently, the above-mentioned approach and schedule, which is consistent with NRC's stated timeframe, reflects our desire to properly balance our resources and continue to pursue plant applications while responding to the Generic Letter.

Should you have any questions on the above, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing. As mentioned previously, we would be pleased to meet with the staff, or to otherwise discuss additional details with you concerning our planned effort.

Very truly yours,



cc: Mr. William Russell
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