

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

October 26, 1989

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

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

SUBJECT: Request for a Temporary Waiver of Compliance to Technical Specification 3.3.A.2.e

REFERENCES:

- 1) Letter, J. O'Toole (Con Edison) to S. Varga (NRC), dated August 2, 1985, Subject: Application for License Amendment to delete requirements for the Boron Injection Tank from Technical Specifications.
- 2) Letter, M. Slosson (NRC) to J. O'Toole (Con Edison), dated December 5, 1985, Subject: Amendment No. 104.

In our August 2, 1985 submittal (Reference 1), we requested an amendment to the Technical Specifications to delete the limiting condition for operation (LCO) and surveillance requirements for the Boron Injection Tank (BIT). The surveillance requirements were cited in Tables 4.1-1 and 4.1-2 and the LCO was cited in Section 3.3.A.1.b. The LCO included the requirements for two channels of heat tracing to be available for the flow path from the BIT. License Amendment No. 104 (Reference 2) was issued to change the Technical Specifications as requested.

It has subsequently been determined that, through an administrative oversight, the corresponding action statement (Section 3.3.A.2.e) for the BIT heat tracing LCO was inadvertently omitted from the amendment request. The BIT heat tracing was previously required to prevent solidification of the minimum 20,000 ppm boric acid solution in the lines from the BIT to the suction of the safety injection pumps. With the removal of the BIT, there is now only a 2000 ppm boric acid solution in the lines from the Refueling Water Storage Tank to the suction of the safety injection pumps. This lower concentration does not require heat tracing to prevent solidification.

Based on the above, it is clear that the BIT heat tracing is not required and the Technical Specification requirement itself was removed in Amendment No. 104. Therefore, its corresponding action statement is not applicable to any existing LCO and should accordingly be omitted. However, since the action statement is still in place, we are unnecessarily maintaining the heat tracing on the suction of the safety injection pumps.

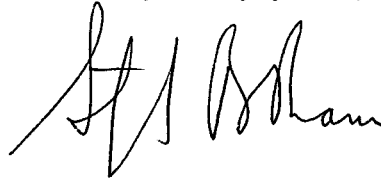
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We intend to seek removal of the BIT heat tracing action statement (Section 3.3.A.2.e) in a license amendment application to be submitted by February 1, 1990. In the interim, we request that a Temporary Waiver of Compliance to this Technical Specification be granted on the basis that it is not applicable to any equipment currently existing in the plant. By this waiver resources would be made available to perform more essential maintenance, especially on equipment needed for plant operation in cold weather. This waiver should remain in effect until issuance of the proposed amendment.

Should you or your staff have any questions regarding this matter, please contact Mr. Jude G. Del Percio, Manager, Nuclear Safety and Licensing.

Very truly yours,



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

Mr. Donald S. Brinkman, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II  
US Nuclear Regulatory Commission  
Mail Stop 14B-2  
Washington, DC 20555

Senior Resident Inspector  
US Nuclear Regulatory Commission  
PO Box 38  
Buchanan, NY 10511

Mayor Village of Buchanan  
236 Tate Avenue  
Buchanan NY 10511

Ms Donna Ross  
Division of Policy Analysis and Planning  
New York State Energy Office  
Agency Building 2, Empire State Building  
Albany, NY 12223