

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 27, 1990

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: Supplemental Submittal Regarding Station Blackout Rule
(10 CFR 50.63)

This letter is in response to issues raised by the NRC regarding utility Station Blackout Rule responses and implementation which used guidance contained in NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors".

NUMARC met with the NRC Staff and summarized its concerns in a letter dated January 4, 1990 to the NUMARC Board of Directors and member utilities. The letter requested that utilities review their response to the Station Blackout Rule, 10 CFR 50.63, and supporting documentation in light of these concerns. Additionally, utilities were requested to supplement their previous Station Blackout submittals indicating that (1) previous submittals were based on the use of the NUMARC 87-00 guidance including the clarifications in the attachments, and/or (2) any deviations from the accepted NUMARC 87-00 guidance have been or will be clearly indicated.

Consolidated Edison has reviewed its response to the NRC and its implementation of the guidance provided by NUMARC 87-00. Our previous submittal is based on this guidance and the methodology used is consistent with that outlined in NUMARC 87-00.

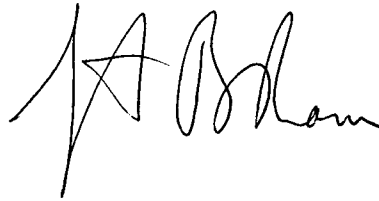
Emergency diesel generator (EDG) reliability values for Indian Point Unit No. 2 were derived using the methodology outlined in Reg. Guide 1.155 (Station Blackout), and are well within the criteria established for the last 20, 50 and 100 valid start demands. Con Edison currently intends to maintain the target reliability chosen for our site and established under our maintenance and test program. Our current program, results in EDG reliability greater than all three criteria established in Reg. Guide 1.155, thus ensuring continued high EDG reliability. Any changes to our current program will be based on in-house review and experience, as is currently the practice, and any guidance made available as a result of work presently in progress on related issues such as Generic Issue B-56 (Diesel Generator Reliability).

9004050366 900327
PDR ADOCK 05000247
P PDC

A050
110

Should the staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. A. Bohan". The signature is written in a cursive style with a large initial "J" and "A".

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