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

April 3, 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: NRC Bulletin No. 88-10: Nonconforming Molded-Case Circuit Breakers

The Attachment to this letter contains our response to NRC Bulletin No. 88-10, "Nonconforming Molded-Case Circuit Breakers".

This response is being provided pursuant to Section 182a, Atomic Energy Act of 1954, as amended. Should you or your staff have any additional questions, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,

Attachment

Subscribed and sworn to
before me this 3rd day
of April, 1989.

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

Notary Public

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

Mr. Donald S. Brinkman, 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

IE21
1/1

8904180052 890403
PDR ADOCK 05000247
Q PNU

Attachment

Response to NRC Bulletin No. 88-10
"Nonconforming Molded-Case Circuit Breakers"

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

Response to NRC Bulletin No. 88-10

Reporting Requirement 1

All holders of operating licenses are required to provide a written report by April 1, 1989, that:

a. Confirms that only molded-case CBs [circuit breakers] that meet the criteria of item 7 of the actions requested are being maintained as stored spares for future use in safety-related applications.

b. Summarizes the total number, manufacturer, model number, and to the extent possible the procurement chain of those CBs that could not be traced to the CBM [circuit breaker manufacturer] in items 1 and 4 of the actions requested. For installed CBs, also identify each system in which they are/were installed. If item 4 of the actions requested has not been completed by April 1, 1989, due to the schedule for tests in item 3 of the actions requested, this information should be updated within 30 days of the completion of item 4 to address those additional CBs that could not be traced to the CBM.

c. Confirms that items 1, 2, 3, 4, 5, 6, and 7 of the actions requested have been completed or will be implemented as requested.

Response to 1a:

Item 7 of the actions requested states that, with the exception of actions taken in response to items 3 and 5 of the actions requested, molded-case CBs installed in safety-related applications after August 1, 1988 should be manufactured by and procured from a CBM under a 10 CFR 50, Appendix B program; or, procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related use by the licensee or others using an acceptable dedication program.

At this time, commercial grade CBs are not upgraded for use in safety-related applications at IP-2. Currently, there are a total of 33 safety-related CBs being maintained as stored spares. All of these have been traced to their corresponding CBM, each a Con Edison approved vendor. The approval process is consistent with the applicable provisions of 10 CFR 50 Appendix B and Regulatory Guides 1.33 and 1.123; vendor's quality assurance organizations and programs are approved by Con Edison Quality Assurance.

Response to 1b:

In regard to our sample, all safety-related CBs purchased prior to August 1, 1988 and being maintained as stored spares (quantity 33), and all safety-related CBs purchased between August 1, 1983 and August 1, 1988 that have been installed (quantity 18), are traceable to the CBM, each being a Con Edison approved vendor.

Response to 1c:

At this time, commercial grade CBs are not upgraded for use in safety-related applications at IP-2. There are a total of 33 safety-related CBs being maintained as stored spares. Another 18 safety-related CBs purchased between August 1, 1983 and August 1, 1988 were installed in one modification. No other safety-related CBs purchased in that time period were installed by modifications. Additionally, no safety-related CBs purchased in that time period were installed as replacements. Our total sample is 51 CBs, 33 from stored spares and 18 from the one modification. All of these CBs are traceable to the CBM, each being a Con Edison approved vendor. Therefore, item 1 of the actions requested has been completed, and items 2, 3, 4, and 5 are not applicable.

Although not part of the sample, 20 CBs purchased in 1982, prior to the period specified in the bulletin, were installed as replacements in the period between August 1, 1983 and August 1, 1988 and these are all traceable to the CBM.

The information generated while performing the actions requested in item 1 is documented and will be maintained for a period of 5 years, as set forth in item 6 of the actions requested.

In regard to item 7a of the actions requested, Con Edison will continue to procure CBs from CBMs whose programs have been evaluated and approved under the 10 CFR 50, Appendix B program for IP-2. The CBMs are evaluated against criteria based on 10 CFR 50, Appendix B or Regulatory Guides.

Concerning item 7b of the actions requested, normally Con Edison does not upgrade CBs but procures directly from the CBM or from a CBM authorized distributor with objective evidence of traceability. For CBs purchased as elements of larger assemblies or systems, traceability will be required and will be assured through interim reviews by personnel cognizant of the traceability requirements. These reviews will be formalized as needed.

Reporting Requirement 2

All holders of operating licenses are required to submit a report that summarizes available results of tests conducted in accordance with items 3 and 5 of the actions requested within 30 days after startup from the first and second refueling outages beginning after March 1, 1989. For CBs that pass these tests, the only information required is the number, manufacturer, model number, and to the extent possible the procurement chain of CBs tested (summary report format is acceptable). For CBs that fail these test(s), these reports should indicate the test(s) and the values of test parameter(s) at which the failure(s) occurred, as well as the corresponding manufacturer, model number, and to the extent possible, the procurement chain.

Response to 2:

Since all the safety-related CBs in our sample are traceable to the CBM as discussed in the response to 1, this is not applicable.

Reporting requirements 3 and 4 apply to holders of construction permits and, therefore, are not applicable to IP-2.