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November 17, 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. 89-02: Stress Corrosion Cracking of High-Hardness Type 410 Stainless Steel Internal Preloaded Bolting in Anchor Darling Model S350W Swing Check Valves or Valves of Similar Design.

This letter is in response to the subject Bulletin and addresses the issues discussed by the Bulletin.

The Bulletin concerns the use of Anchor Darling swing check valves, Model S350W, and valves of similar design with internal preloaded bolting material of ASTM Specification A193 Grade B6 Type 410 SS. Drawings of record on file do indicate that Anchor Darling check valves of the model specified were used at Indian Point Unit 2. Their application is to isolate the Accumulators from the Reactor Coolant System. However the bolting material stated in the Parts list on the drawing is ASTM A-276 Type 410 SS which has not been identified as being susceptible to stress corrosion cracking.

As part of our Inservice Inspection program during the 1989 refueling outage, two check valves (897B and 897C) were dismantled, inspected and the bolting material sent to an independent laboratory for analysis. The scope of the independent investigation included a visual inspection, a non-destructive investigation for cracks and hardness, and a chemical analysis for composition. The results of the investigation indicated one of the studs to be ASTM A-276 type 410 SS while the second set of studs was identified as ASTM A-193 B-8 type 304 SS. The 304 SS is believed to be a substitution which occurred during original plant construction when these valves were subject to repair.

Of concern to us is the observed man-rem exposure incurred during the Inservice Inspection activity. Since both our current records and actual inspection efforts fail to indicate that the Indian Point Unit 2 valves contain bolting material of the suspect type identified by the Bulletin, it is unwarranted to disassemble all check valves. The valves in question are located in high radiation areas. In lieu of this effort we propose to continue with our planned Inservice Inspection effort which requires disassembly and inspection of one check valve each refueling outage. Ultimately all valves will be inspected and assurance obtained that correct materials are being used without increasing the man-rem exposure associated with a one time inspection of all valves in addition to our required Inservice Inspection Program.

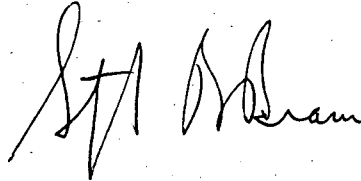
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The check valves identified above are the only Indian Point 2 application known at this time which would fall into the suspect category. We will, of course, work collectively with the NRC to address technical concerns associated with this issue, as they may be identified by the NRC or industry.

If you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



cc: Mr. William Russell
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