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Vice President

Consolidated Edison Company of New York, Inc.
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January 25, 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: NRC Bulletin No. 89-03 - "Potential Loss of Required Shutdown Margin During Refueling Operations"

Please find in Attachment I the response to the actions requested in the subject Bulletin.

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
Regional Administrator - Region I
US Nuclear Regulatory Commission
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ATTACHMENT I

RESPONSE TO REQUESTED ACTIONS
NRC BULLETIN NO. 89-03

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JANUARY, 1990

Action 1. Assure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain sufficient refueling boron concentration to result in a minimum shutdown margin of approximately 5%.

Response 1. The reactor coolant boron concentration during refueling operations assures that the final core configuration meets the 5% shutdown margin as specified in the Plant's Technical Specifications. Westinghouse, the IP-2 core designer, has provided core loading guidance which will assure that intermediate core configurations will not be more reactive than the final core configurations analyzed in the reload safety evaluation. This guidance has been incorporated within the IP-2 core loading procedures.

Action 2. Assure that fuel loading procedures only allow those intermediate fuel assembly configurations that do not violate the allowable shutdown margin and that these procedures are strictly adhered to.

Response 2. See Response 1.

Action 3. Assure that the staff responsible for refueling operations is trained in the procedures recommended in Item 2 above and understand the potential consequences of violating these procedures. This training should include the fundamental aspects of criticality control with higher enriched fuel assemblies.

Response 3. Con Edison's training program and the training programs of vendors when they are utilized for refueling activities, provide full coverage of the referenced subjects for cognizant personnel. Vendor training program documentation is required by Con Edison and subject to audit.