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Vice President

Consolidated Edison Company of New York, Inc.
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August 22, 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: Second Ten-Year Interval Inservice Inspection Program Relief
Request No. 26

By letter dated November 4, 1987, Consolidated Edison (Con Edison) submitted relief request No. 26 which sought exemption from the requirements of ASME Code Section XI as it pertained to emergency repairs/replacements and temporary repairs/replacements.

The basis for this request was threefold. First, implementation of Code acceptable repairs while the plant is at power is often impossible. Second, Con Edison and the NRC have arrived at different assessments of the code acceptability of certain repair methods. Although the ASME is the only organization that can officially determine the Code acceptability of temporary repairs, NRC opinions as to Code compliance have in the past formed the basis for issuance of violations. Last, isolation of small leaks in some systems of minor safety significance could lead to unnecessary cycling of safety related equipment due to shutdown and startup operations.

On June 15, 1990, the NRC issued Generic Letter 90-05 which acknowledged the impracticality of implementing Code compliant repairs while the plant is in operation. However, the Generic Letter still requires prior NRC written approval of non-code compliant repairs.

The Generic Letter establishes temporary repair methods acceptable to the NRC for different classes of piping. Although not directly addressing the subject relief request, the Generic Letter is a step in the right direction and does provide a better basis for resolution of urgent repairs. On this basis, the subject relief request is hereby withdrawn. We may resubmit a similar relief request in the future if our experience with the Generic Letter is not satisfactory.

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

Very truly yours,



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