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February 4, 1991

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: Response to NRC Bulletin No. 88-11, Pressurizer
Surge Line Thermal Stratification

In order to address the issue of surge line thermal stratification for purposes of responding to NRC Bulletin 88-11, the Westinghouse Owners Group (WOG) implemented a program to generically evaluate the effects of stratification on surge line integrity (Reference 1). This bounding evaluation compares WOG plants to those for which detailed plant specific analysis has been performed. Since this evaluation provides less than full design life verification, a generic justification for continued operation (JCO) was developed for use by each of the WOG plants. This JCO was reviewed and accepted by the USNRC (Reference 3). Subsequent to the bounding evaluation and generic JCO, the WOG performed a generic detailed analysis on categories of plants grouped according to the similarity of their response to thermal stratification (Reference 2). The results of this generic detailed analysis demonstrate that the original JCO basis remains valid and fully applicable to Indian Point Unit 2. This report was reviewed by the NRC and accepted for reference by WOG plants in a review conducted by the NRC in Pittsburgh, Pennsylvania on November 8-9, 1990.

Con Edison, together with the New York Power Authority (NYPA), licensee of Indian Point 3, have initiated a combined IP-2/IP-3 program to complete the plant specific evaluation of the surge line over its design life. We expect this work to be completed in the third quarter of 1991.

Indian Point Unit No. 2 will be bounded by the JCO until the plant specific analyses are completed.

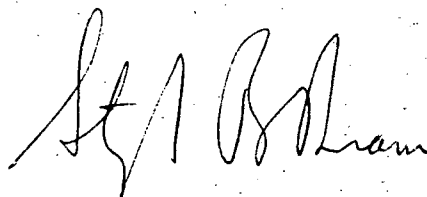
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Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



References:

- 1) B.J. Coslow, "Westinghouse Owners Group Bounding Evaluation for Pressurizer Surge Line Thermal Stratification". WCAP-12277 (Westinghouse Proprietary Class 2), WCAP-12278 (Non-Proprietary Version), June 1989.
- 2) B.J. Coslow, "Westinghouse Owners Group Pressurizer Surge Line Thermal Stratification Generic Detailed Analysis Program MUHP-1091 Summary Report". WCAP-12639 (Westinghouse Proprietary Class 2), WCAP-12640 (Non-Proprietary Version), June 1990.
- 3) SER from NRC on WCAP-12277 as per WOG Letter OG-90-56, 9/4/90.

cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
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