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

July 19, 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: Implementation Status of Generic Letter 89-13 Required Actions

Ref.: 1) Con Edison Letter to USNRC dated 2/2/90
2) USNRC Letter to Con Edison dated 2/22/90

Consolidated Edison submitted the first of the two required responses to Generic Letter 89-13, "Service Water System Problems Affecting Safety - Related Equipment," in reference 1. In our response, we committed to implementing several actions by the end of our 1991 refueling outage. This letter serves to provide an update status of our commitments with regard to Generic Letter 89-13.

This response is submitted pursuant to the provisions of Section 182a, Atomic Energy Act of 1954 as amended. 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,

Attachment

Subscribed and sworn to
before me this 24th day
of July, 1991.

Karen L. Lancaster
Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified in Westchester County
Term Expires 9/30/91

A065
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cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
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Mr. Francis J. Williams, Jr., Project Manager
Project Directorate I-1
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Senior Resident Inspector
US Nuclear Regulatory Commission
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ATTACHMENT

IMPLEMENTATION STATUS OF GENERIC LETTER 89-13

REQUIRED ACTIONS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JULY, 1991

I NRC Generic Letter 89-13, Required Action I Response

A) We will implement a program to visually inspect the Service Water System intake structures of both Indian Point Units 1 and 2. Inspections will initially be conducted at a frequency of once per refueling cycle. The structures will be examined for macroscopic biological fouling, sedimentation and corrosion.

STATUS

We have completed our inspections of the Unit 1 and 2 intake structures scheduled for this refueling cycle.

B) In addition, we will continue the chlorination and chemical monitoring procedures presently in place on Unit 2, and will re-implement the chlorination and monitoring procedures on Unit 1. We also have a policy in place for chlorination of the Service Water System during periods of lay-up.

STATUS

The re-implementation of the chlorination system on Unit 1 is presently in-process. However, design changes affecting equipment schedules will delay implementation of the Unit 1 chlorination system until after the 1991 refueling outage. Design changes are under evaluation for possible systems interactions with the new Unit 2 Ristroph condenser cooling water screens. The new Unit 1 chlorination system is expected to be fully operational by November 1, 1991.

II NRC Generic Letter 89-13, Required Action II Response

We have identified twenty-four (24) safety related heat exchangers cooled by the service water system for inclusion in a test/inspection program. The program to be implemented will divide the heat exchangers into two groups. The first group of heat exchangers will be part of a performance test program in which flow and temperature measurements will be used to calculate and verify the heat transfer capability of each unit....

...The heat exchangers included in the second group will be incorporated in a routine inspection and maintenance program, in which the units will be opened and inspected for cleanliness, biofouling and corrosion/erosion....

...Initial testing/inspection frequency will be set at once per refueling outage.

STATUS

We have implemented the test/inspection program for the twenty-four heat exchangers identified for inclusion in the program. The testing and inspections scheduled for the 1991 refueling outage have been completed. However, testing of new replacement radiation monitor sample coolers resulted in two being unsatisfactory for use. Two existing radiation monitor sample coolers have not been changed. We will address this problem with the manufacturer. Upon resolution, these coolers will be replaced.

III NRC Generic Letter 89-13, Required Action III Response

...we are presently evaluating various inspection techniques for implementation in a service water underground pipe inspection program. Information obtained from these inspections will be evaluated as noted in the existing program.

Service Water System component degradation will be monitored by a number of in place or soon to be implemented programs that ensure the system's ability to perform its safety function. A check valve inspection program, the heat exchanger test/inspection program described in our response to Required Action II and the above pipeline inspection program all provide data for engineering assessment as noted above.

STATUS

We have initiated an internal visual inspection program for the underground service water pipe. This program utilizes pipe crawling video equipment to inspect and record the condition of the cement-lined underground pipe. The results of the inspections showed the piping to be in very good condition with only a few indications of liner damage. Those areas were subsequently repaired. All inspections scheduled for the 1991 refueling outage have been completed.

IV NRC Generic Letter 89-13, Required Action IV

STATUS

Response provided in Reference 1. No further actions required.

V NRC Generic Letter 89-13, Required Action V

STATUS

Response provided in Reference 1. No further actions required.