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December 24, 1991  
Re: Indian Point Unit No. 2  
Docket No. 50-247

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Subject: NRC Generic Letter 88-20, Supplement 4: Individual  
Plant Examination of External Events (IPEEE) for Severe  
Accident Vulnerabilities - 10CFR50.54(f)

This is in response to NRC Generic Letter 88-20, Supplement 4,  
dated June 28, 1991 which requested an Individual Plant  
Examination of External Events by each licensee.

Indian Point Unit No. 2 has already been the subject of a  
detailed, comprehensive risk assessment, the Indian Point  
Probabilistic Safety Study (IPPSS), published in 1982. This risk  
assessment included consideration of external initiating events  
including the five external events requested to be assessed in  
the subject Generic Letter. Subsequent amendments addressing  
specific issues were published in 1982 and 1983. This study was  
the result of a substantial effort (totaling more than 30 man-  
years for Indian Point Units 2 and 3) by a combined  
utility/contractor team and was subject not only to an extensive  
peer review process but also to an intense technical critique by  
the Nuclear Regulatory Commission, its contractors and several  
other organizations.

Since the issues addressed in the IPPSS and the methodologies  
utilized continue to be reflective, in most instances, of those  
used today, it is Con Edison's intention to respond to the  
Generic Letter by building upon that study. Based on the  
guidance provided in NUREG-1407, however, we will enhance and  
update the previous study where appropriate to provide a more  
current treatment of the external events involved, and to account  
for any changes to the Indian Point 2 plant configuration and  
procedures which have been implemented since performance of the  
IPPSS. Although our intent is to build upon our existing  
probabilistic risk assessment, we will seek, where practical, to  
incorporate industry-developed tools (such as the Fire  
Vulnerability Evaluation Methodology) to focus and provide a more  
developed structure to our analyses.

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With regard to the requested evaluation of relay functionality in a seismic event, persuasive evidence exists from past efforts to conclude that the performance of a full relay evaluation, at considerable resource expenditure, will yield no substantive benefit in terms of risk insight or risk reduction beyond that to be gained from performance of the relay evaluation already required by Generic Letter 87-02 together with a thorough search for those additional relays which fall under IPEEE and which are known to exhibit low seismic ruggedness. NUREG-1407 provides no correlation between the importance to risk of relay performance under postulated seismic conditions and the probability of exceeding the Safe Shutdown Earthquake (SSE) level which was the parameter used to develop the current "full scope" plant list given in that NUREG. Both the draft and final NUREG-1407 guidance endorses use of the EPRI NP-6041 relay evaluation process which is independent of the plant specific design basis or hazard level of those plants in the 0.3g Review Level Earthquake bin. In the absence of a plant-specific justification for requiring Indian Point Unit 2 to incur this substantial additional expense, which does not appear to be cost-justified or warranted, we request reconsideration of this requirement. We propose to perform a thorough search for low seismic ruggedness relays which fall under the scope of the IPEEE in conjunction with performance of a full A-46 relay effort. Should additional information gained during this review indicate that the evidence found to date concerning the limited value of a full IPEEE relay evaluation is not applicable to Indian Point Unit 2, we would, at that point, consider initiating the additional activities necessary to address that concern.

With regard to the overall designation of Indian Point Unit 2 as a seismic "full scope" plant, we are continuing to evaluate the historical record regarding the characterization of potential seismic activity at the Indian Point site. In the event that the results of our evaluation support removal of this designation, we will provide that additional information in a supplemental response.

Both the NRC and the industry have recognized the importance and value of coordinating the efforts to be performed in response to Generic Letter 88-20, Supplement 4 with those required by Generic Letter 87-02, entitled "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46". Generic Letter 88-20 in fact encourages such coordination "so that the objectives of both activities may be accomplished with a single walkdown effort".

As stated in NRC SECY-91-102, the procedures for the seismic walkdown portion of this program are "one of the most important ingredients in the seismic IPEEE, [and] are similar to those that will be used in the implementation of Unresolved Safety Issue (USI) A-46 ...". We agree that such coordination, including combining the walkdowns of both programs into a single walkdown, is important given the need to focus finite resources and to dedicate the specific technical expertise needed to carry out the evaluations.

Indian Point Unit No. 2 is a USI A-46 plant and a member of the Seismic Qualification Utility Group ("SQUG"). Because of the similarities of the two programs, Con Edison intends to conduct the Indian Point Unit No. 2 seismic IPEEE and A-46 walkdowns at the same time to avoid repetition of essentially the same work within a short time span. However, the anticipated Supplemental Safety Evaluation Report ("SSER") on the SQUG's Generic Implementation Procedure ("GIP") for resolution of USI A-46 has not been made available in sufficient time to permit finalization of a coordinated plan and schedule for the seismic portion of the IPEEE in this response. Con Edison is therefore unable to establish a firm schedule to complete the seismic portion of the IPEEE until after receipt and review of the SSER, and in no case later than 120 days following receipt of the SSER. Following this review, Con Edison may modify its program for conducting the seismic IPEEE depending on the content of the SSER and resolution of open items. Given our overall approach to performance of the IPEEE and the need to integrate the various portions of the IPEEE in evaluating results and developing a final response, we would intend to provide an overall schedule for the entire IPEEE effort at that time.

Should you have any questions on the above, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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