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

August 8, 1989

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: Safety Injection System Relief Valve 855

REFERENCES:

8908180259 890808

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- 1) NRC Inspection Report No. 50-247/89-10
- 2) Con Edison letter dated June 16, 1989, S. B. Bram to NRC
- 3) ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition with Addenda through Winter 1981

This letter provides the followup to Reference 2, where we indicated that we were evaluating the setpoint of relief valve 855 and the safety impact of postulated lifting with failure to close.

A new safety evaluation has been completed by Westinghouse for the reduction of the high head safety injection flow to the reactor coolant system due to the postulated failure of valve 855 to close. The flow reduction due to the fully open valve is less than 20 gpm. The safety evaluation is applicable to the current Cycle 10 operation, both at the present power rating of 2758 MWt as well as at the stretch rating of 3083.4 MWt.

The safety evaluation confirmed the conclusion of the earlier evaluation, discussed in Reference 1, that, even if relief valve 855 remains open during an accident, the safety injection system would still be capable of performing its intended safety function and that the conclusions in the FSAR remain valid. Therefore, premature lifting or failure to close of this relief valve does not render the safety injection system inoperable.

Article IWV-1100, entitled "SCOPE", of Reference 3 defines the scope of valves to be tested in accordance with the Reference 3 inservice testing (IST) requirements. This scope is defined as "certain class 1, 2, and 3 valves...which are required to perform a specific function in shutting down a reactor to the cold shutdown condition or in mitigating the consequences of an accident." Since the safety evaluation concluded that the malfunction or failure of valve 855 will not result in a design or regulatory limit being exceeded and that the conclusions in the FSAR remain valid, we believe that this valve is not within the scope of IST applicability and therefore is not required to be included in the IST program.

We do plan to continue to include the monitoring of valve 855 as part of the quarterly safety injection pump testing. However, based on the above noted safety evaluation, we believe that misoperation of this valve, or its failure to operate properly, will not by itself render the safety injection system inoperable.

We are continuing our evaluation of a pressure setpoint change or other alternative to reduce the chance of premature lifting or failure to close properly. If we decide to make a change, it will be implemented by means of our normal modification control process, as applicable.

The safety evaluation described above, as well as other documents and activities related to this valve, are available at the station.

Should you or your staff have any questions regarding this matter, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs and Safety Assessment.

Very truly yours,

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cc: Mr. William Russell Regional Administrator - Region I US Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1498

> Mr. Donald S. Brinkman, Project Manager Project Directorate I-1 Division of Reactor Projects I/II US Nuclear Regulatory Commission Mail Stop 14B-2 Washington, DC 20555

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