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July 9, 1992

Re: Indian Point Unit No. 2  
Docket No. 50-247

Mr. Clifford J. Anderson, Acting Chief  
Engineering Branch, Division of Reactor Safety  
Region I, US Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

SUBJECT: Response to Inspection Report No. 50-247/92-08;  
Inservice Testing Inspection

Dear Mr. Anderson:

We have reviewed the subject inspection report, transmitted to us by your letter dated May 20, 1992, and wish to clarify several statements made in the letter and the report.

Your letter provided the following summary of the revisions which we agreed to make in our Inservice Testing (IST) program.

"On April 30, 1992, your staff agreed to revise the IST program to require: (1) Periodic testing to ensure that the 3 month test interval is maintained, (2) Testing 30 days prior to declaring a system operable and (3) Evaluation and corrective action for cold shutdown and refueling valves, when the stroke times increase to the point at which the stipulations of the American Society of Mechanical Engineers Code IWV-3417 are met."

Items (2) and (3) of the above statement require some clarification. In item (2), the activity which we will perform within 30 days prior to declaring a system operable is exercising the valves, as defined in IWV-2300(a) of the 1980 ASME Boiler and Pressure Vessel Code. This commitment is applicable to those valves in a system declared inoperable or not required to be operable, in accordance with IWV-3416, unless quarterly testing has been continued during the period of inoperability.

Regarding item (3), the IST program has been revised to require either evaluation or corrective action when the stipulations of IWV-3417 apply. Usually, it will not be necessary to both evaluate and correct the condition. Normally, corrective action will be taken. The alternative would be an evaluation, the purpose of which would be to show that the as-found condition is acceptable and therefore corrective action is unnecessary or can be delayed.

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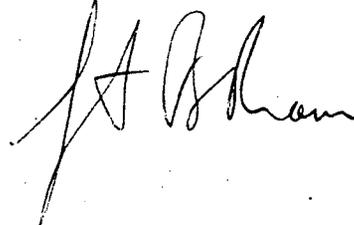
Furthermore, a misstatement appears in Section 2.1 on page 3 of the inspection report, concerning the level of our response to the different ranges of test results, as specified in IWP-3230. The report stated:

"Where the test observations were in the action range, the test frequency was increased..."

Our test program satisfies the requirements of IWP-3230. IWP-3230 requires increased test frequency if test results fall within the alert range. IWP-3230 also requires determination of the cause of the deviation and correction of the condition if test results fall within the required action range.

Should there be any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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