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November 5, 1992

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

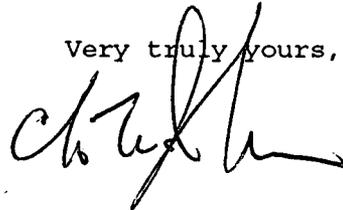
SUBJECT: Generic Letter 91-04, Changes in Technical
Specification Surveillance Intervals to
Accommodate a 24 Month Fuel Cycle

The subject Generic Letter requests a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals on instrument drift and its effect on safety. At Indian Point Unit 2, the surveillance test procedures used for refueling calibrations will reflect surveillance criteria based on statistical analysis of historical data and channel statistical analysis. Engineering judgement will be used to specify surveillance criteria more conservative than the maximum allowances. This will facilitate review and evaluation to assess the accuracy of predicted equipment behavior.

Failure of "as-found" data to comply with surveillance criteria is brought to the attention of appropriate management via a Significant Occurrence Report. This will trigger corrective action to provide assurance that during the next operating cycle instrument performance will remain acceptable. In terms of plant safety, use of historical data provides a greater than a 95% probability basis to conclude that drift will remain within Safety Analysis limits.

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,



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