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

June 4, 1993

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: NRC Generic Letter 91-04, 24 Month Technical Specification Surveillance Program

In 1992, Con Edison undertook an extensive program to revise all Technical Specification surveillance intervals associated with a refueling schedule to 24 months in accordance with NRC Generic Letter 91-04. Four Technical Specification Amendments have been submitted to date.

Consistent with the guidance from Generic Letter 91-04, the basis for extending surveillance intervals for instrument channels is an assessment of instrument drift which would be associated with the longer operating cycle. This drift has been determined with a high probability and a high degree of confidence. For Reactor Protection Systems and Engineered Safety Features Actuation Systems we adopted a criteria of 95% reliability with 95% confidence. This approach is reflected in the Technical Specification amendments submitted and approved by the NRC to date and is consistent with NRC positions on previously reviewed analyses. For other systems being reviewed in our program such numeric guidance (i.e., 95/95) has not been addressed for Indian Point 2. We therefore, have adopted a graded approach that is commensurate with the importance of the instrument channel.

We believe this graded approach is consistent with the industry position being developed by ISA SP67.04 and reflects NRC comments in that standard's development. We had intended to delay our decision concerning the graded approach until the standard was formally issued and endorsed however, the balloting procedure is consuming more time than we originally envisioned. Therefore, since our schedule requires that we proceed without further delay in this regard, we would like to advise you in advance that future Technical Specification amendment applications pertaining to surveillance intervals will reflect the criteria stated below.

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The following graded approach will be used:

Level 1, Reactor Protection System / Engineering Safety Feature Actuation System protection functions, explicit control functions required by DNB analyses - 95% probability /95% confidence level.

Level 2, Emergency Operation Procedures/ Post Accident Monitoring and control functions not explicitly utilized in DNB analyses - 95% probability /75% confidence level.

Level 3, Balance of plant functions, control room indication, recorder process computer indication, and miscellaneous alarms - Conservative Engineering judgement using the Square Root Sum of the of the Squares (SRSS) technique.

As the Generic Letter does not specify numerical values for high probability/high confidence levels, and in view of the pending revision to the ISA standard, we trust you will find the graded approach stated above to be acceptable. Since considerable resources will be expended in implementing this approach, should there be any reservations on the part of the NRC we request that we be advised immediately.

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

Very truly yours,

cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Francis J. Williams, Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511