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March 9, 1994

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: Third Ten-Year IST Program, Clarification of Scope of NRC Evaluation

This letter clarifies the scope of NRC evaluations requested in our December 30, 1993 submittal (Reference 1) of the third ten-year interval Inservice Testing (IST) program summary. This clarification is provided based on telephone discussions with the NRC IST coordinator.

Certain pumps and valves included in the program submittal are non-ASME Code Class components. These components are designated "N/A" in the pump list in Enclosure 2 to Reference 1 and "NA" in the valve summary table in Enclosure 3 to Reference 1, in the column labeled "Qual Group". These are components which perform safety functions and are therefore required to be tested in accordance with 10 CFR 50 Appendix A, General Design Criterion 1, and Appendix B, Criterion XI. The testing of these pumps and valves is administratively controlled under the IST program. However, strict adherence to the provisions of subsections IWP and IWV of ASME Code Section XI is not required for the components in this augmented portion of the IST program.

Also, since 10 CFR 50.55a(f) applies only to ASME Code Class components, NRC evaluation of relief requests pertaining to the non-Code Class components is not required. Therefore, the following relief requests may be omitted from the NRC's evaluation:

Pump Relief Request 3

Valve Relief Requests 1, 3, 4, 6, 7, 9, 19, 20, 21, 22, 23, 25* and 30

* Except for the Hydrogen Recombiner valves, which are the only ASME Code Class valves in Relief Request 25.

In addition, NRC Generic Letter 89-04, dated April 3, 1989, granted generic approval of certain relief requests. These relief requests are designated with an asterisk in the Index of Relief Requests in Enclosure 3 to Reference 1, and consist of Valve Relief Requests 11 through 24, and 30. These relief requests may also be omitted from the NRC's evaluation.

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Thus, the remaining relief requests, for which NRC evaluation is requested, are:

Pump Relief Requests 1 and 2

Valve Relief Requests 2, 5, 8, 10, 25*, 26, 27, 28 and 29.

Pump Relief Request 1 and Valve Relief Requests 2, 5, 8, 10 and 26 were granted, and Pump Relief Request 2 was granted in part, for the second interval program, as referenced in each of these relief requests. Valve Relief Requests 27, 28 and 29 are new ones.

Finally, attached is a revised Index of Justifications. This revised index supersedes the one in Enclosure 3 to Reference 1, and identifies the non-Code Class valves which have been included in the augmented IST program. The non-Code Class valves are denoted by a "No" in the column labeled "Quality Group." For the non-Code Class valves, NRC evaluation is not required for the justifications of testing during cold shutdown or refueling outages.

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
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INDEX OF JUSTIFICATIONS

VALVE	QUALITY GROUP	SYSTEM	PAGE NUMBER	ALTERNATE FREQUENCY
FCV-625, 797, 784	YES	CCW	3	CS/R
744	YES	RHR	4	R
741A	YES	RHR	5	CS
882A, 882B	YES	CCW	6	CS/R
769, 786, 789	YES	CCW	7	CS/R
743, 1870	YES	RHR	8	CS
738A, 738B	YES	RHR	9	CS
746, 747	YES	RHR	10	CS
730, 731	YES	RHR	11	CS
FCV-417L/427L/437L/447L	NO	FW	12	CS
FCV-417/427/437/447	NO	FW	13	CS
BFD-79/79-1/79-2/79-3	YES	AFW	14	R
BFD-31, BFD-47/47-1/47-2/47-3	YES	AFW	15	R
BFD-2-21, BFD-2-22	NO	FW	16	CS
BFD-39/34/37/35/42/40	YES	AFW	17	R
201, 202	YES	CVCS	18	CS
205, 226	YES	CVCS	19	CS
222	YES	CVCS	20	CS/R
4925, 4926, 4927, 4928	YES	CVCS	21	CS/R
250A, 250B, 250C, 250D	YES			
333	YES	CVCS	22	CS
LCV-112B, 290	YES	CVCS	23	CS
LCV-112C	YES	CVCS	24	CS
332	YES	CVCS	25	CS
4924	YES	CVCS	26	CS
CT-26/29/32	YES	AFW	27	R
FCV-1170/1171/1172/1173	NO	HVAC	28	CS
1878, 1880A/B, 1879A/B	YES	HR	29	CS
1881C/A/D	YES	HR	30	CS
PCV-1228	NO	IA	31	R

INDEX OF JUSTIFICATIONS

VALVE	QUALITY GROUP	SYSTEM	PAGE NUMBER	ALTERNATE FREQUENCY
1500 through 1543	NO	IVSW	32	R
1545 through 1550	NO			
5602, 1406, 1456	NO			
MS-1-21/22/23/24	YES	MS	33	CS
PCV-1133	NO	MS	34	CS
HCV-3100, HCV-3101	YES	RCS	35	CS
838A/B/C/D	YES	RCS	36	CS
867A, 867B	YES	CSS	37	R
856B, 856F	YES	SIS	38	CS
856A/C/D/E	YES	SIS	39	CS
842, 843	YES	SIS	40	CS
857A/B/C/D	YES	RCS	41	R
857G/H/M/F	YES			
857J/K/E/L	YES	RCS	42	R
881	YES	SIS	43	R
847	YES	SIS	44	R
849A/B, 852A/B, 5220	YES	SIS	45	R
882	YES	SIS	46	CS
1810	YES	SIS	47	CS
1802A, 1802B	YES	SIS	48	R
880A through 880K	YES	CSS	49	R
FCV-1111, FCV-1112	YES	SW	50	CS
4107, 4108	NO	N2	51	CS
SOV-1277, SOV-1278	NO	WCPS	52	CS
SOV-1334 through 1339 SOV-1340 through 1345 SOV-1434 through 1439	NO	WCPS	53	CS
204A, 204B	YES	RCS	54	CS
210A, 210B	YES	RCS	55	CS
85C, 85D, 95C, 95D	NO	WCPS	56	CS
211	YES	RCS	57	CS
212	YES	CVCS	58	CS
PCV-455A, PCV-455B	YES	RCS	59	CS