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June 3, 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: Proposed Changes in Technical Specification
Surveillance Intervals to Accommodate a 24 Month
Fuel Cycle

This letter is in response to discussions with Mr. F. Williams, NRC Project Manager for Indian Point Unit 2, concerning clarification of past Technical Specification Amendment requests that have been submitted in conjunction with revising all Technical Specification refueling surveillances to a 24 month basis in accordance with Generic Letter 91-04.

For the Refueling Water Storage Tank Safety Assessment, submitted by our letter of February 18, 1994, all completed test procedures from the last six calibrations were reviewed. Each surveillance interval consisted of 3 months for a total period of 18 months. This amount of data satisfied our reliability goal of 95% probability at a 75% confidence level.

Also within the February 18, 1994 submittal were Safety Assessments for 6.9 kv undervoltage relays and the 480 volt undervoltage and degraded voltage relays. The 6.9 undervoltage relays and the 480 volt degraded voltage relays were replaced in 1993 with solid state, high accuracy devices. The long term performance of these new relays is predicted to be superior to the previously installed relays based upon equipment specifications. In addition, the "test" column of Table 4.1-1 should have been annotated to reflect a 24 month (+25%) surveillance interval at the same time the calibration interval was changed to reflect a 24 month (+25%) surveillance interval for items 29a., 29b., and 30c. A revised page is enclosed.

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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
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