Stephen E. Quinn
Vice President

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December 15, 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: Incorporation of ASME Code Case N-498-1
(TAC No. M90245)

Con Edison letter dated August 11, 1994 requested authorization to incorporate Code Case N-498-1 into our ISI program to support systems leakage tests which are planned for a refueling outage scheduled to begin in early February, 1995. The request for authorization was made under the provisions of 10 CFR 50.55a(a)3 as referenced in footnote 6 to 10 CFR 50.55a.

In conversations with your staff on November 30 and December 7, 1994, additional information was requested regarding the potential burden imposed on Con Edison, specifically the impact on the 1995 refueling outage, in the event that the request for authorization to incorporate the Code Case could not be approved in sufficient time to support refueling outage planning activities.

If Code Case N-498-1 is incorporated into our ISI program for the 1995 refueling outage, the major effect would be the elimination of certain 10 year hydrostatic tests on Class 3 systems during the outage. These tests had previously been required by the ASME Boiler & Pressure Vessel Code, Section XI, until the approval of Code Case N-498-1 by the ASME on May 11, 1994.

If Code Case N-498-1 is not incorporated into the 1995 outage activities, the following burdens would result:

1. A hydrostatic test of portions of the Component Cooling Water (CCW) System would be required. Performing such a test is a very complex evolution which requires a CCW System outage. The System outage in turn requires either limited monitored heatup of the spent fuel pool at a time when the reactor is defueled with a maximum amount of fuel in the pool, or, alternatively, providing a temporary, costly cooling system, including a backup diesel generator, for the spent fuel pool. Neither of these cases is a preferred method of operation for the spent fuel pool.

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2. A hydrostatic test of portions of the Service Water System (SWS) would be required. Performing such a test is exceedingly resource-intensive. The test boundary for the SWS includes large butterfly type valves normally used for flow control purposes, not as isolation valves. These flow control valves typically are not capable of leak tightness and must be blanked off to support the hydrostatic test. For the portion of the SW System scheduled for the 1995 outage, five such valves, ranging in size from 8" to 18", must be blanked. Additionally, during the installation of blanks for the SWS hydrostatic test, during the test, and during the blank removal, SWS cooling for the CCW System would not be available, leading to spent fuel pool heatup considerations as described above.

Code Case N-498-1 is a revision to Code Case N-498, which has been endorsed in Regulatory Guide 1.147. This revision was made to incorporate Class 3 systems into the Code Case. The basis for this revision was the conclusion that hydrostatic tests do not verify structural integrity of piping systems and that no significant benefit would be obtained as compared to performing leak tests at normal operating pressure. Additionally, the revised Code Case implicitly recognized that performing hydrostatic tests on Class 3 systems involves significant operational and schedular difficulties. By implementing Code Case N-498-1, outage testing time and costs can be significantly reduced with minimal impact on the level of quality and safety.

In the case of the CCW System, we believe that the hydrostatic test is unnecessary. The system is normally in continuous operation at a pressure close (75%) to system hydrostatic pressure. it contains corrosion-inhibited fresh water to preclude corrosion. The inhibitor is sampled regularly to assure proper chemistry. The system is one closed loop. System leakage is checked by monitoring water level in an associated surge tank which is recorded every 4 hours. In addition, the surge tank has continuous level indication and associated alarms in the Central Control Room. A system leakage test at normal operating pressure is performed every inservice inspection period. Additionally, accessible portions of the system are monitored via regularly scheduled operator rounds.

In the case of the SW System, we also believe that the hydrostatic test is unnecessary. The portion to be tested is normally in continuous operation. Welds in piping 4" and larger throughout the system are monitored for corrosion based on radiographic sampling inspections every refueling outage. Underground piping is periodically examined with remote visual equipment. A system leakage test at normal operating pressure is performed every inservice inspection period. Accessible portions of the system are monitored via regularly scheduled operator rounds.

The non-accessible portions of the CCW and the SW Systems which would be due for hydrostatic testing this outage are located inside containment. Any leakage inside containment is detected by sensitive, redundant and diverse means, as required in Technical Specifications Sections 3.1.F and 4.16 and described in the UFSAR Section 6.7.

Considering the:

- o major impact on the upcoming refueling outage in the absence of an authorization to incorporate Code Case N-498-1 into our ISI program,
- o minimal value of hydrostatic testing,
- o normal system operation, and
- o various inspections and means of monitoring discussed above,

we request timely authorization, in accordance with the provisions of 10 CFR 50.55a(a)3, to incorporate Code Case N-498-1 into our ISI program to support leakage tests during the upcoming refueling outage scheduled to begin in early February, 1995.

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

Very truly yours,

Stephen E. [illegible]

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