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January 6, 1995

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: Revised Relief Request, Third Ten-Year Interval ISI
Program (TAC No. M88559)

Con Edison letter dated January 24, 1994 submitted the Inservice Inspection (ISI) Program Summary for the third ten-year interval. Requests for relief were included in accordance with 10 CFR 50.55a(a)(3) and (g)(6) and Technical Specification 4.2.2.

Con Edison letter dated November 16, 1994 provided additional information in response to NRC letter dated October 13, 1994. Included in our response was Revision 1 to Relief Request No. 8.

In a telephone conference on December 20, 1994 we provided clarification to the NRC staff and contract reviewers regarding the scope and proposed alternate inspection of Relief Request No. 8. As requested by the NRC Staff, we hereby submit the enclosed Relief Request No. 8, Revision 2, to document the clarifications. We believe that this revision is responsive to the reviewers' questions and adequately clarifies our intended examination scope and methodology.

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

Very truly yours,



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ENCLOSURE I

RELIEF REQUEST NO. 8, REVISION 2
FOR
THE THIRD TEN-YEAR INSERVICE INSPECTION PROGRAM

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JANUARY, 1995

RELIEF REQUEST NUMBER 8, Rev. 2
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COMPONENT IDENTIFICATION

Code Class: 1
References: IWA-2500, Table IWB-2500-1
Examination Category: B-B, B-D
Item Number: B2.51, B2.80, B3.150, B3.160
Description: Inspection of Regenerative Heat Exchanger Circumferential Welds,
Tubesheet-to-Shell Welds, Nozzle-to-Vessel Welds and Nozzle Inside
Radius Sections
Component Numbers: See Table, Pages 2 and 3

CODE REQUIREMENT

Table IWB-2500-1, Category B-B, requires a volumetric examination be performed on the Regenerative Heat Exchanger tubesheet-to-shell welds. Category B-D requires volumetric examination of the nozzle-to-vessel welds and nozzle inside radius sections.

Specific Code Requirements From Which Relief is Sought

Table IWB-2500-1:

Item No. B2.51 -	Examination of 100% of weld length
Item No. B2.80 -	Examination of 100% of weld length
Item No. B3.150 -	Examination of all nozzles
Item No. B3.160 -	Examination of all nozzles

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(g)(5)(iii) and (g)(6)(i), relief is requested on the basis that compliance with the code requirement is impractical.

The regenerative heat exchanger was designed and fabricated to codes in effect during the late 1960's. These codes did not require that there be full access for inservice inspection, as was required by later codes. The component was designed before inspection, ample access and weld configuration conducive for examination were required.

The UT scan paths for the examination of the circumferential head, the tubesheet-to-shell and nozzle welds are limited by the proximity of these welds to each other and the weldolets proximate to those welds. Drawing A206921 (in Appendix B of ISI Program Summary) and photograph A14511-3 (attached) illustrate the problem with obtaining the required 90% coverage and support our estimates of actual coverage described in the table on pages 2 and 3.

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PROPOSED ALTERNATE EXAMINATION

All subject welds will be UT examined to the extent possible. The estimated examination coverage is provided in the table on pages 2 and 3.

The nozzle welds will also be surface-examined (liquid penetrant) in accordance with requirements for B9.32 (branch pipe connection) welds. This type of examination is appropriate and adequate due to the similarity of weld details between these nozzles and the configuration depicted in ASME Boiler & Pressure Vessel Code, Section XI, Figure IWB-2500-10, which illustrates a typical branch pipe connection.

In addition, all component parts and welds associated with the regenerative heat exchanger will be visually examined during hydrostatic testing as required by IWB-2500, category B-P, and in accordance with Code Case N-498.

PERIOD FOR WHICH RELIEF IS REQUESTED

Relief is requested for the third inspection interval, July 1, 1994 thru July 1, 2004.

JUSTIFICATION FOR THE GRANTING OF RELIEF

The history of reliable operation by this and similar components at other plants combined with the described UT examinations, liquid penetrant examination, and visual examinations (VT-2) during pressure testing will be sufficient to assure an acceptable level of quality and safety is maintained.

COMPONENT NUMBERS

REGENERATIVE HEAT EXCHANGER

Drawing No.: B206921

Circumferential Head Welds (Item No. B2.51)*

<u>50% Available</u>	<u>75% Available</u>
RGXC 1-1 (D207858)	RGXC 1-4 (D207861)
RGXC 2-1 (D207866)	RGXC 2-4 (D207869)
RGXC 3-1 (D207874)	RGXC 3-4 (D207877)

* Note that there is no category for heat exchanger head-to-shell welds. Category B2.51 is for circumferential head welds, which is further confirmed by reference to figure IWB-2500-20. This is the same item number used during the 2nd interval for this weld.

Tubesheet-to-Shell Welds (Item No. B2.80)

<u>50% Available</u>	<u>75% Available</u>
RGXC 1-2 (D207859)	RGXC 1-3 (D207860)
RGXC 2-2 (D207867)	RGXC 2-3 (D207868)
RGXC 3-2 (D207875)	RGXC 3-3 (D207876)

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Nozzle-to-Vessel Welds (Item No. B3.150)

50% AVAILABLE

RGXN 1-1 (D207862)
RGXN 1-2 (D207863)
RGXN 2-1 (D207870)
RGXN 2-2 (D207871)
RGXN 3-1 (D207878)
RGXN 3-2 (D207879)

75% AVAILABLE

RGXN 1-3 (D207864)
RGXN 1-4 (D207865)
RGXN 2-3 (D207872)
RGXN 2-4 (D207873)
RGXN 3-3 (D207880)
RGXN 3-4 (D207881)

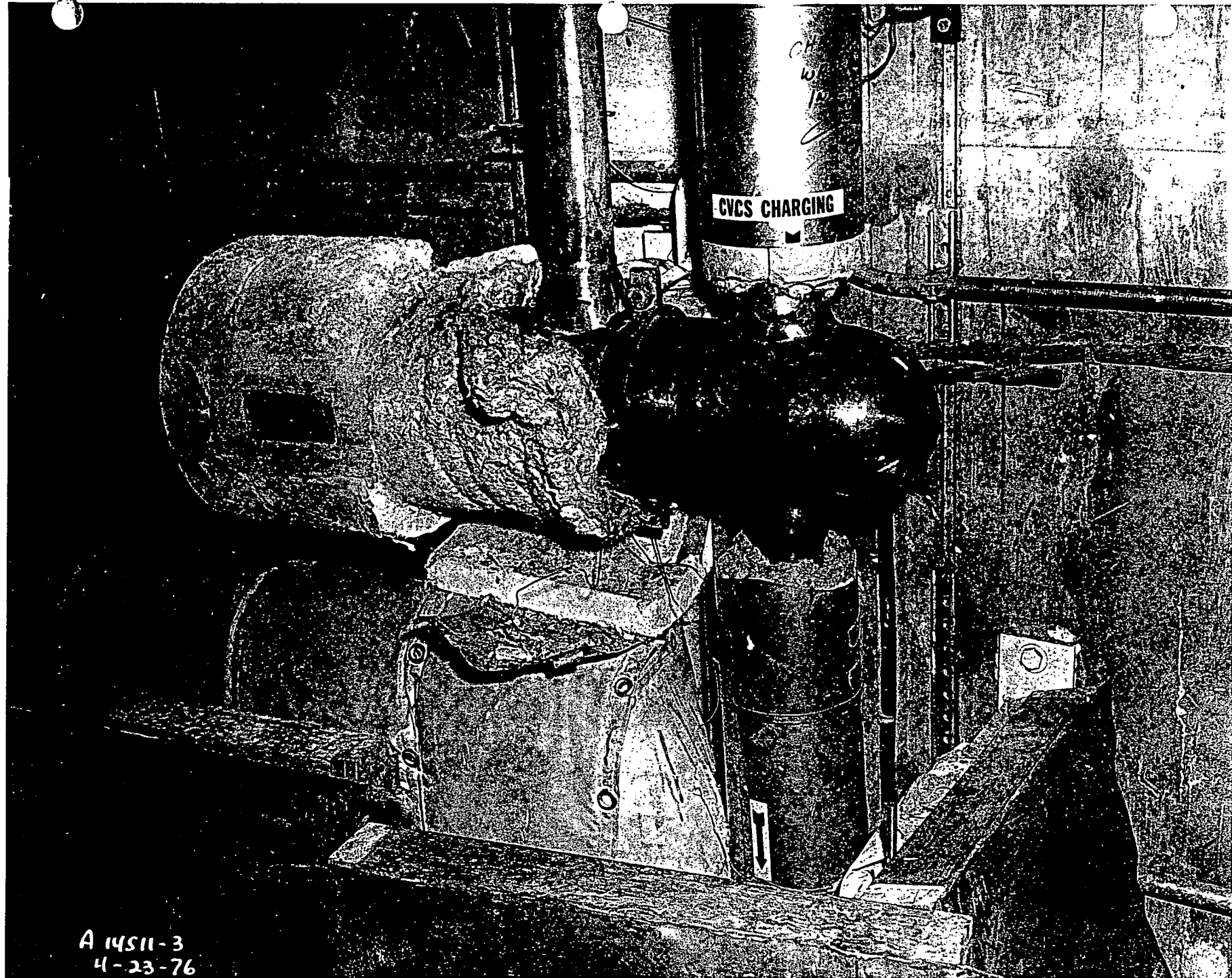
Nozzle Inside Radius Sections (Items No. B3.160)

50% AVAILABLE

RGXN 1-1 (D207862)
RGXN 1-2 (D207863)
RGXN 2-1 (D207870)
RGXN 2-2 (D207871)
RGXN 3-1 (D207878)
RGXN 3-2 (D207879)

75% AVAILABLE

RGXN 1-3 (D207864)
RGXN 1-4 (D207865)
RGXN 2-3 (D207872)
RGXN 2-4 (D207873)
RGXN 3-3 (D207880)
RGXN 3-4 (D207881)



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