UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE INSERVICE TESTING PROGRAM REQUESTS FOR RELIEF

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

## 1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice testing (IST) of certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class 1, 2, and 3 pumps, valves and components be performed in accordance with Section XI of the ASME Code and applicable addenda, except where alternatives have been authorized or relief has been requested by the licensee and granted by the Commission pursuant to Sections (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for its facility. Section 10 CFR 50.55a authorizes the Commission to approve alternatives and to grant relief from ASME Code requirements upon making the necessary findings.

The Consolidated Edison Company of New York, Inc. (the licensee or Con Ed), submitted the Third 10-Year Interval Inservice Testing (IST) Program, including relief requests, on December 30, 1993. The NRC staff Safety Evaluation (SE) was issued on November 30, 1994, and it addressed all relief requests. On January 24, 1994, the licensee submitted the Third 10-Year Interval Inservice Inspection (ISI) Program. Included in the relief requests for the ISI Program was one involving the examination and functional testing of snubbers. The snubbers are considered as components to be included in the IST Program and, therefore, will not be documented as part of the NRC staff SE for the ISI Program. This SE for the snubber relief request is supplemental to the IST Program SE issued on November 30, 1994.

Enclosure

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## 2.0 EVALUATION

Pursuant to 10 CFR 50.55a(a)(3)(i), Con Ed has requested relief from the ASME Section XI requirements for the inspection and testing of Code Class 1, 2, and 3 snubbers.

The proposed alternative provided is to perform the inspection and testing of the Code Class snubbers in accordance with the Indian Point 2 (IP2) Technical Specification (TS) requirements.

Con Ed has requested relief, pursuant to 10 CFR 50.55a(a)(3)(i), on the basis that the proposed alternative would provide an acceptable level of quality and safety. TS 4.12 requires comprehensive programs for visual examination and functional testing of all safety-related hydraulic snubbers. The scope of these TS programs encompasses all Code Class 1, 2, and 3 snubbers. A large portion of the safety-related snubbers are also Code Class. The overlap of the visual examination and testing programs in accordance with ASME Code Section XI, and TS for the Code Class snubbers presents an unnecessary redundancy. Con Ed maintains that there is no decrease in the overall level of plant safety due to performing the snubber examinations and testing as required by the plant TSs in lieu of ASME Section XI requirements.

The Code Class snubbers for which relief is requested are part of the set of safety-related snubbers for which inspection and testing requirements are established by the IP2 TS Section 4.12. The TS inspection requirements are based on the recommendations of Generic Letter (GL) 90-09, in which the NRC staff encouraged licensees to propose TS changes consistent with the GL 90-09 guidance. The recommended inspection schedule was based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. The GL was issued to provide a program consistent with a 24-month refueling cycle and to effect reductions in occupational exposure and cost savings.

Based on the above, the NRC staff agrees that the overlap of the ASME Code, Section XI, and TS examinations and testing is an unnecessary redundancy and that examinations and testing in accordance with the TSs provide an adequate level of quality and safety.

## 3.0 CONCLUSIONS

Pursuant to 50.55a(a)(3)(i), the NRC staff grants relief for the third inspection interval, July 1, 1994, thru June 30, 2004, from the ASME Section XI requirements for the examination and testing of Code Class 1, 2, and 3 snubbers. The relief is granted on the basis that the proposed alternative, i.e., examination and testing in accordance with the IP2 TS Section 4.12, provides an acceptable level of quality and safety.

Principal Contributor: F. Williams

Date: April 19, 1995

April 19, 1995

Mr. Stephen E. Quinn
Vice President - Nuclear Power
Consolidated Edison Company
of New York
Broadway and Bleakley Avenue
Buchanan, NY 10511

SUBJECT: INSERVICE INSPECTION PROGRAM RELIEF REQUEST FOR SNUBBER EXAMINATIONS AND INSPECTIONS, INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 (TAC M88559)

Dear Mr. Quinn:

By letter dated January 24, 1994, the Consolidated Edison Company of New York, Inc., submitted Relief Request 31 to the Third 10-Year Interval Inservice Inspection (ISI) Program and requested relief from the provisions of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, requirements for examination and functional testing of Code Class snubbers. An alternative was proposed in the relief request. Snubbers are evaluated by the NRC staff as part of the Inservice Testing (IST) Program and, therefore, Relief Request 31 will not be included in the Safety Evaluation (SE) for the ISI Program. The NRC staff's SE for this relief request is enclosed.

The NRC staff reviewed the subject request for relief and concluded in the enclosed SE that the alternative provided an acceptable level of quality and safety. Therefore, pursuant to paragraph 50.55a(a)(3)(i) of Title 10 of the Code of Federal Regulations, the proposed alternative contained in the relief request is authorized.

Sincerely.

Ledyard B. Marsh, Director
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: Safety Evaluation

cc w/encl: See next page

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