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Vice President

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October 16, 1995

Re: Indian Point Unit No. 2
Docket No. 50-247

Document Control Desk
US Nuclear Regulatory Commission
Mail Station PI-137
Washington, DC 20555

SUBJECT: 10 CFR 50.54(f) Notification in Response to Generic Letter
95-07

Pursuant to 10 CFR 50.54(f), this letter provides Consolidated Edison's
(Con Edison) written response to the subject generic letter.

Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-
Related, Power-Operated Gate Valves," dated August 17, 1995, requests
certain actions be taken by utilities regarding the susceptibility and
evaluation of power-operated gate valves to these phenomena.

The generic letter has two requested actions. First, within 90 days, identify
the valves which are potentially susceptible to pressure locking and
thermal binding, and provide a basis for their operability. Second, within
180 days, perform an evaluation of susceptible valves, and further analysis
and corrective actions with justification for longer implementation
schedules as needed.

The responses required of utilities are: 1) a 60-day response providing the
extent of intended implementation of the requested actions and associated
schedule, or an alternate course of action as appropriate, and 2) a 180-day
response documenting the second requested action by providing the
following requested information:

1. Description of susceptibility evaluations, additional analysis, and
the susceptibility criteria used.
2. Evaluation results, including a list of susceptible valves.
3. Corrective actions identified, schedules, and justifications of
operability as appropriate.

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In response to utilities' concerns about being able to provide timely and complete responses to the generic letter, the Westinghouse Owners Group has developed a program to assist utilities in addressing the requirements of Generic Letter 95-07. In part, the program will establish a common set of criteria which can be applied in the screening and evaluation of the pressure locking and thermal binding phenomena. Most of the NSSS systems, as well as many of the valves in those systems, are common among the various Westinghouse plants. Thus, it is beneficial and cost effective, to both WOG members and the NRC, to utilize the expertise of the member utilities and Westinghouse to develop a consistent, effective, and comprehensive set of screening and evaluation criteria that can be used by all WOG plants. To this end, a task team of WOG members has been formed as a part of this program and is in the process of developing the criteria.

A set of screening criteria will be defined to identify valves potentially susceptible to pressure locking and thermal binding, taking into account both component and systems considerations. Criteria and methodology are also being developed to assist in determining the impact on safety function capability for each valve determined to be potentially susceptible to pressure locking and thermal binding. Once the criteria have been established, each utility can apply the criteria to its own population of safety-related, power-operated gate valves. As potentially susceptible valves are identified, the evaluation criteria and methodology could be used to determine the impact on valve safety function capability.

Because of the importance in completing further evaluations to determine what effect pressure locking and thermal binding may have on valve operability, it is felt that resources can be more appropriately and productively focused on meeting the requested 180-day actions, and waive the requested 90-day action. The WOG Task Team has established an aggressive schedule for the criteria development for valves potentially susceptible to pressure locking and thermal binding. Even with this aggressive schedule, operability assessment efforts will be most effective if they are concentrated on only those valves for which long term safety function capability is not demonstrated. If at any time during the evaluation process, a valve is determined to be incapable of performing its safety function, an operability assessment will be made and justification of continued operability developed. If operability cannot be demonstrated, the applicable technical specification actions will be followed.

Con Edison will comply with all actions and responses specified in the 180-day required response. These include completion and documentation of the following:

- Screening criteria.
- List of susceptible valves.
- Description of evaluations.
- Susceptibility evaluation results.
- Corrective actions taken or scheduled.
- Justifications for continued operability, as needed.

These actions will be completed and the responses provided to the NRC within 180 days of the date of Generic Letter 95-07.

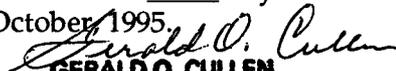
In your Inspection Report No. 50-247/95-04 dated April 26, 1995, you stated that our evaluation of pressure locking an thermal binding for motor-operated valves (MOV's) was comprehensive and technically thorough. Based on this, we feel that the actions described in Generic Letter 95-07 have already been addressed for MOV's. However, if in preparing the requested 180-day actions any MOV is found to be potentially susceptible, a complete evaluation as described above will be preformed.

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

Very truly yours,



Subscribed and sworn to
before me this 16 day
of October, 1995.


GERALD O. CULLEN
Notary Public, State of New York
No. 4959345
Qualified in Westchester County
Commission Expires November 27, 1997
Notary Public

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