Stephen E. Quinn
Vice President

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November 15, 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: Response to US Nuclear Regulatory Commission Letter on Consolidated Edison's 60-day Response to Generic Letter 95-07

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.

Pursuant to 10 CFR 50.54 (f), Consolidated Edison (Con Edison) provided a written response to GL 95-07 on October 16, 1995. In response to your November 3, 1995 letter, Con Edison is complying with the 90 day actions which include identification of the valves which are potentially susceptible to pressure locking and thermal binding (PLTB) and documentation of a basis for their operability.

The enclosed attachment to this letter includes a screening evaluation of all safety related air operated gate valves potentially susceptible to PLTB. There are no hydraulically actuated gate valves at Indian Point 2. Valves that were determined to be susceptible were further evaluated and their operability was documented using current industry acceptable methods for evaluation. The results demonstrate that potential PLTB conditions will not prevent the plant from achieving safe shutdown and no safety concerns exist.

Con Edison previously completed comprehensive evaluations on the issue of PLTB for motor operated gate valves, as documented in Inspection Report No. 50-247/95-04, dated April 26, 1995. These evaluations were performed on 22 motor operated gate valves which screening criteria had shown to be potentially susceptible.

These motor operated gate valve evaluations (Calc. No. MEX-00131-00) were reviewed again to determine if there are any critical deficiencies in light of the more recent information obtained from the NRC Region I public workshop on November 2, 1995. As a result of these reviews and evaluations we continue to believe that all safety related power-operated gate valves at Indian Point 2 remain capable of performing their required function when called upon.

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Should you or your staff have any concerns regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing.

Very truly yours,

Stephen E. [illegible]

Subscribed and sworn to
before me this 15th day
of November, 1995.

Karen L. Lancaster
Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified In Westchester County
Term Expires 9/30/97

cc: Mr. Thomas T. Martin
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ATTACHMENT

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

1.0 PURPOSE

In response to Generic Letter 95-07, Con Edison performed a screening of all air operated valves (AOVs) at IP2. A computer database search was performed on plant valve records. All Class A AOVs were queried from the Power Plant Maintenance Information System (PPMIS) database, which compiled a list of 261 valves. The PPMIS system and vendor drawings were used to further categorize the valves into gate, globe, butterfly, diaphragm or check valves. The list was further screened for air operated gate valves only. After this screening was performed only two valves remained, PCV-1310A and PCV-1310B. These two valves were evaluated in greater detail and found not to be susceptible to PLTB.

2.0 EVALUATION METHODOLOGY

The purpose of this evaluation is to determine the number of safety related air operated gate valves potentially susceptible to PLTB. A three step screening process was used to identify those valves. The following methods of evaluation and acceptance are to be used for those AOVs that are found to be potentially susceptible to PLTB:

- Identify valves that are normally open and required to close for a test or surveillance. These valves may be susceptible to PLTB when called upon to reopen after the test or surveillance. Valves can be eliminated from further evaluation if they are on a train/system that is covered in the Plant Technical Specifications. This is because Technical Specifications place the plant in a Limiting Condition for Operation and a PLTB condition will be treated as any other mechanical failure of the train/system. Thus, Technical Specifications will require placing the plant in hot shutdown if the valve remains inoperable after a defined time limit.

- Provide a technical basis demonstrating that PLTB will not occur because the actuator is capable of providing sufficient thrust to open the valve without damaging the valve or actuator.

- Provide either written administrative controls or a valve modification to prevent PLTB from occurring if the actuator is not capable of providing sufficient thrust to overcome PLTB.

3.0 SCREENING

3.1 FIRST SCREENING - Air Operated Valves

The first screening used a computer database system to identify the type of valves in the Plant. This search identified 261 Class A air operated valves in the system.

3.2 SECOND SCREENING - Air Operated Gate Valves

These valves were further sorted into gate valves using the PPMIS system and vendor valve drawings. It is known that the PLTB phenomena applies to only gate valves (per INPO SOER 84-7 and USNRC-NUREG-1275, see Reference No. 2). This sort reduced the list to 2 gate valves, PCV-1310A and PCV-1310B.

3.3 THIRD SCREENING - Air Operated Gate Valves Susceptible to PLTB

The listed gate valves are subject to PLTB only when in the closed position. It is therefore necessary to review the above two gate valves to determine the normal position of the valve and whether it would be closed, and subsequently required to open at any time to mitigate the consequences of an accident.

There are two valves, PCV-1310A and PCV-1310B, that are susceptible to possible PLTB and require further analysis.

4.0 AOVs Functional Evaluation

4.1 AOVs PCV-1310A, PCV-1310B

Valve Description

Valves PCV-1310A and PCV-1310B are 4 inch double disc, parallel seat air operated valves manufactured by WKM (model OPG Pow-R-Seal with operator model 1305-SP by Saf-T-Gard) and are located in the Auxiliary Feedwater System. These valves function to isolate steam to the turbine driven auxiliary feedwater (AFW) pump in the event that the steam line were to rupture inside the AFW room. These valves are normally in the open position and may be susceptible to PLTB when they are closed during a quarterly surveillance test. These valves are eliminated from further evaluation because they are in a system that is covered by Plant Technical

Specifications. Technical Specifications place the plant in a Limiting Condition for Operation during the surveillance test. The Plant Technical Specifications require the return of the system to full operability within 72 hours. Any inoperable component on the system that delays its return will require that the reactor be placed in hot shutdown within the next 12 hours (see IP2 Technical Specifications section 3.4). A PLTB valve constitutes an inoperable component and is covered under our existing Technical Specification. Thus, further evaluation is not required. Nevertheless, if valves PCV-1310A and PCV-1310B were closed, either intentionally or inadvertently, plant procedures direct that a bypass valve be opened to equalize pressure upstream and downstream of the valve prior to opening. This pressure equalization would preclude a PLTB condition from preventing valve opening.

5.0 REFERENCES

1. USNRC Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety Related Power Operated Gate Valves," dated August 17, 1995.

2. USNRC NUREG-1275 Vol. 9, "Operating Experience Feedback Report - Pressure Locking and Thermal Binding of Gate Valve," dated March 1993.

3. Con Edison Indian Point Nuclear Generating Unit No. 2 Technical Specifications.