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August 14, 1996

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: Follow up on Generic Letter 93-04 "Rod Control System Failure and Withdrawal of Rod Cluster Control Assemblies, 10 CFR 50.54(f)", Indian Point Nuclear Generating Station Unit No. 2

By letter dated August 5, 1993, Con Edison responded to Generic Letter 93-04. On December 22, 1993, Con Edison responded to the NRC's Request for Additional Information (RAI) regarding Generic Letter 93-04. On August 21, 1995, Con Edison informed the NRC that it had implemented a current order surveillance test to be performed during every refueling outage at our Indian Point 2 plant, and that the results of the test performed during our 1995 outage verified that no failures that result in corrupted current orders, including Salem Unit 2 type failures, exist in the Indian Point 2 rod control system. This letter, in accordance with the request set forth in Generic Letter 93-04 and the commitments made in our December 22, 1993 letter, updates the NRC on our actions since August 21, 1995 and our future plans.

As we had committed to NRC, Con Edison has performed on-line testing of the rod drive coil currents. Two tests have already been performed at power, about six months apart which demonstrated that no corrupted current orders exist.

We have also been following the industry experience with current orders and the response of the Control Rod Drive Mechanisms (CRDMs). We remain concerned that the significantly increased duty placed on the lift coil, due to the change in current orders, may have an undesirable effect on long term coil life and reliability. If a lift coil burns out, normal rod control is not possible (In or Out). Reactor trip would still function. Westinghouse Infogram IG95007 reports that the closing time for stationary grippers has not been as expected. Since data now available show mechanism response time differences from those projected originally, we are concerned that the "Salem" modification fix might not be the best long term solution for Indian Point Unit 2.

Based on the above, as an alternative to the modification Con Edison would like to propose that it continues performing periodic on-line tests of the rod drive coil currents. We believe that this, along with the existing rod exercise tests and the refueling test is an excellent way of detecting corrupted current orders. This program, we believe, can be a suitable alternative to the modification. We prefer it for Indian Point Unit 2, since it is not subject to changes in characteristics of the drive mechanisms and will not create any potential for long term effects on our coil stack life and reliability. The ability to trip is not affected.

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We would be happy to meet with you to discuss this alternative to the WOG
current order modification.

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

Very truly yours,



cc: Mr. Hubert J. Miller
Regional Administrator - Region I
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