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

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, DC 20555-0001

SUBJECT: Indian Point 2 Technical Specification Interpretation

As discussed with members of the regulatory staff, Consolidated Edison requests an interpretation of the Technical Specification as to the definition of the term operable as it applies to the Auxiliary Feedwater System (AFW) under certain scenarios. A question was raised during operator training as to the need to declare an LCO (Limiting Condition for Operation) entry for 21 and/or 23 AFW pumps when an operator places auxiliary feed control in manual to control steam generator level(s).

In general, if the pump(s) are in service, this is considered operable (i.e., operating is operable). If on the other hand the pump(s) are placed in off and pull to lock, they are neither operating nor operable. NUREG-1431, Rev. 1, Standard Technical Specifications, Westinghouse Plants, addresses dual use components for RHR (Residual Heat Removal) "An RHR train may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned to the ECCS mode of operation". Using this position a similar intent can be interpreted for AFW.

NRC Inspection Manual Part 9900: Technical Guidance, OPERABLE/OPERABILITY: Ensuring the Functional Capability of a System or Component, 10/31/91, section 6.7, Use of Manual Action in Place of Automatic Action, states, in part, "the licensee's determination of operability with regard to the use of manual action must focus on the physical differences between automatic and manual action and the ability of the manual action to accomplish the specified function". The differences include "... emergency operating procedures written for automatic mode of operation". The Indian Point Emergency Operating Procedures contain the required instructions in steps 9, 19, and 20 of procedure E-0, Reactor Trip Or Safety Injection, to ensure that the AFW pumps are running and supplying water to all steam generators.

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Since Indian Point intends to convert to the NUREG-1431 Standard Technical Specifications, and since this could be considered a generic change to NUREG-1431, a proposed change to NUREG-1431 has been submitted through the approved industry process.

Very truly yours,



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