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March 20, 1997

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

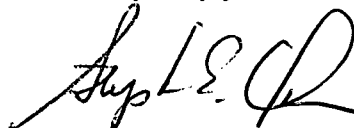
SUBJECT: Clarification of Testing Requirements for Inservice
Inspection Program Relief Request 35 (TAC No. M91514)

REFERENCES: 1) Letter dated July 3, 1996, J.A. Mitchell (NRC) to
S.E. Quinn
2) Letter dated November 7, 1996, G.F. Wunder
(NRC) to S.E. Quinn

Relief Request 35, which was approved by Reference 1, discussed the removal of insulation on Class 1 mechanical joints and the conduct of VT-2 visual examination of the mechanical joint for leakage. The mechanical joint does not have to be pressurized during this examination. During the same outage as this examination and at the code required frequency, a system pressure test and VT-2 visual examination for leakage must also be performed with insulation installed.

Following the issuance of Reference 1, the need to observe a 4-hour hold during the system pressure testing was discussed in a telephone call with the NRC. This letter confirms our intent, as requested in Reference 2, to observe a 4-hour hold time during the system pressure testing of insulated systems prior to conducting a VT-2 visual examination for leakage.

Very truly yours,



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