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Vice President

Consolidated Edison Company of New York, Inc.
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Telephone (914) 734-5340

July 21, 1994

Re: Indian Point Station
Docket No. 50-247

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

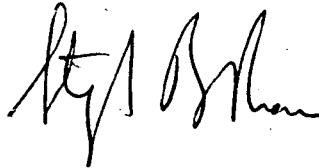
SUBJECT: Completion of Items from Response to NRC Bulletin
No. 90-01, Supplement 1, "Loss of Fill-Oil in
Transmitters Manufactured by Rosemount"

Our response to the subject bulletin was provided on March 1,
1993. This letter confirms, as required by Reporting
Requirement 2c, the completion of Items 1 and 2 of Requested
Actions from the bulletin. The attachment contains the
specifics regarding completion of the items applicable to
Indian Point Unit No. 2.

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,

Subscribed and sworn to
before me this 21ST day
of July, 1994.



Karen L. Lancaster
Notary Public

Attachment

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified In Westchester County
Term Expires 9/30/95

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cc: Mr. Thomas T. Martin
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
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Mr. Francis J. Williams, Jr., Project Manager
Project Directorate I-1
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Mail Stop 14B-2
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US Nuclear Regulatory Commission
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ATTACHMENT

CONFIRMATION OF COMPLETED ITEMS FROM
RESPONSE TO NRC BULLETIN 90-01, SUPPLEMENT 1
"LOSS OF FILL-OIL IN TRANSMITTERS MANUFACTURED BY ROSEMOUNT"

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JULY, 1994

CONFIRMATION OF COMPLETED ITEMS FROM
RESPONSE TO BULLETIN 90-01, SUPPLEMENT 1

For the items that were applicable to Indian Point Unit No. 2, completion is confirmed as follows:

Requested Action Item 1b:

This item requested a licensee to "replace, or monitor for the life of the transmitter on a quarterly basis using an enhanced surveillance monitoring program, any transmitters that have a normal operating pressure greater than 1500 psi and that are used in safety-related applications but are not installed in reactor protection trip systems, ESF actuation systems, or ATWS systems. At their discretion, licensees may monitor using an enhanced surveillance program at least once every refueling cycle, but not exceeding 24 months, transmitters in this category if the appropriate psi-month threshold criterion recommended by Rosemount has been reached, and the monitoring interval is justified based upon transmitter performance in service and its specific function. Provide to the NRC a copy of the licensee justification to extend the enhanced surveillance program beyond the quarterly test interval for transmitters that have reached the appropriate psi-month threshold criterion recommended by Rosemount."

Rosemount transmitters within this category are installed at Indian Point 2 in the Reactor Vessel Level Instrumentation system (RVLIS), one pair for the wide range and a second pair for the narrow range. These transmitters have reached the appropriate psi-month criteria recommended by Rosemount. The wide range transmitters are currently being monitored in an enhanced surveillance program at a frequency that complies with the bulletin requirements. The narrow range transmitters only indicate when the reactor coolant pumps (RCPs) are not running, and they are currently being monitored in an enhanced surveillance program at least once every refueling cycle during a shutdown when the RCPs are not running. Since the RCPs may continue to run during an unplanned plant shutdown, this interval may exceed 24 months.

Justification to extend the enhanced surveillance program beyond the quarterly test interval was provided in the March 1, 1993 response to Bulletin 90-01, Supplement 1. This justification was included in a "Report on the Enhanced Surveillance Program for Rosemount Transmitters" rather than being incorporated into the enhanced surveillance program document as stated in the March 1, 1993 submittal.

In the response to Reporting Requirement 2b in our March 1, 1993, submittal, we indicated that we were investigating the possibility of replacing the sensors for Rosemount transmitters and sensor modules that are located in warehouse stock with units manufactured after July 11, 1989 to preclude the need to monitor their performance should they be installed in the future. It has been decided not to obtain a replacement sensor for the spare wide range RVLIS transmitter. Two spare sensors for the narrow range RVLIS transmitters have been redesignated for use in transmitters that have a normal operating pressure less than or equal to 500 psi.

CONFIRMATION OF COMPLETED ITEMS FROM
RESPONSE TO BULLETIN 90-01, SUPPLEMENT 1

Requested Action Item 1c:

"[For PWRs] Replace, or monitor at least once every refueling cycle, but not exceeding 24 months, using an enhanced surveillance program until the transmitter reaches the appropriate psi-month threshold criterion recommended by Rosemount, any transmitters that have a normal operating pressure greater than 500 psi and less than or equal to 1500 psi and that are installed in reactor protection systems, ESF actuation systems, or ATWS systems."

Rosemount transmitters in this category are installed at Indian Point 2 to monitor main steam flow, and are currently being monitored in an enhanced surveillance program at a frequency that complies with the bulletin requirements.

In the response to Reporting Requirement 2b in our March 1, 1993, submittal, we indicated that we were investigating the possibility of replacing the sensors for Rosemount transmitters and sensor modules that are located in warehouse stock with units manufactured after July 11, 1989, to preclude the need to monitor their performance should they be installed in the future. It has been decided not to obtain replacement sensors for the spare main steam transmitters.

Requested Action Item 1f:

"At licensee discretion, exclude from the enhanced surveillance program any transmitters that have a normal operating pressure less than or equal to 500 psi. A high degree of confidence should be maintained for detecting failure of these transmitters caused by a loss of fill-oil and a high degree of reliability should be maintained for the function consistent with its safety significance."

Rosemount transmitters in this category are installed at Indian Point 2 to monitor containment sump level and containment fan cooler unit cooling water flow. These transmitters have been excluded from the enhanced surveillance program. A description of the means by which a high degree of confidence and a high degree of reliability are maintained for the transmitters was included in a "Report on the Enhanced Surveillance Program for Rosemount Transmitters" rather than being incorporated into the enhanced surveillance program document as stated in the March 1, 1993 submittal.

Requested Action Item 2:

"Evaluate the enhanced surveillance monitoring program to ensure that the program provides measurement data with an accuracy range consistent with that needed for comparison with manufacturer drift data criteria for determining degradation caused by a loss of fill-oil."

The enhanced surveillance program was evaluated to this criteria, and the evaluation is included in the enhanced surveillance program document.