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February 17, 1999

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

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

Subject: Status Update and Change of 10CFR50.54(f) Commitments
Regarding Adequacy and Availability of Design Bases Information

Reference: Con Edison Letter to USNRC dated February 13, 1997

Consolidated Edison Company of New York, Inc. (Con Edison) previously provided its response to the Commission's October 9, 1996 request for information, pursuant to 10 CFR 50.54(f), regarding the adequacy and availability of design bases information. In our February 13, 1997 response we committed to performing several tasks relative to the Indian Point Unit No. 2 (IP-2) design bases processes. The purpose of this letter is to review the status of those commitments, note additions to programs exceeding the original commitment scope, and inform the Commission of changes to our original commitment completion dates.

The commitments identified in our February 13, 1997 response were as follows:

- UFSAR review program scheduled for completion within the next 24 months.

This program will include the following elements:

1. Verification of the accuracy of UFSAR design basis information.
2. Review to confirm that the UFSAR design basis information is properly reflected in plant operation, maintenance, and test procedures.
3. Review the UFSAR to identify and resolve any internal disagreements or inconsistencies, which could impact the design basis.
4. Development of a process to enhance overall UFSAR accessibility.

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- Continuation of the Design Basis Document (DBD) Initiative.
 1. Supplementation of the currently existing 22 DBDs with a combination of additional DBDs and added information on interfacing systems to existing DBDs with the next 24 months.
 2. Verification of the compatibility of the design basis requirements in the UFSAR with new and existing DBDs.
 3. Development of a process to enhance overall accessibility and retrievability of DBD information, and keep DBD information current.
- Continuation of the SSFA program with at least one SSFA to be performed per year.
- Development and implementation of a training module to increase awareness of the significance of design basis information, its documentation and maintenance. This training will be completed by December 31, 1997 for personnel currently assigned.

Current Status

The verification of the accuracy of the UFSAR is well under way, having been initiated in the fall of 1997. This project is approximately 65 % complete. The current version of the UFSAR through Revision 14 has been divided into approximately 15,000 segments, with each segment individually categorized and reviewed for accuracy. UFSAR Chapters 1 through 13 are being verified by Con Edison. Westinghouse, the nuclear steam supply system (NSSS) designer for IP-2, has been contracted to verify Chapter 14, the accident analysis portion of the UFSAR, using similar verification methodology as the internal Con Edison program.

The Design Basis Document effort is also in progress. A contract was awarded to Raytheon Corporation (now merged with United Engineers and Constructors, the original architect-engineer for IP-2) for fourteen (14) balance of plant (BOP) DBDs. Twelve (12) DBDs for NSSS-related systems were awarded to Westinghouse. Currently there are six (6) DBDs in progress: Residual Heat Removal / Safety Injection, Engineered Safeguard Features, 125V DC, Instrument Air, Containment Structures, and Seismic Structures and Devices.

In an effort to make information more accessible to plant personnel, a plant wide IP-2 website was developed and is now fully operational and in use. This website contains text searchable versions of the updated UFSAR, an annotated revision history version of the UFSAR, and pertinent docketed correspondence between Con Edison and the NRC from original plant licensing up until 1997. This correspondence is in text searchable format. There are numerous other features and databases available to plant personnel, and their number is expected to continue to increase over time. Our remaining activities to be completed include establishing a process to add future licensing correspondence onto the website, as well as adding the remaining correspondence from 1997 to the present, and verifying that the electronic version of the UFSAR contained on the website accurately reflects the controlled hard copy version.

A project to optically scan and index archived design basis information was completed in early 1998. This effort added to the IP-2 website database over 1.2 million pages of information from approximately 28,000 documents. These documents consist of plant modifications, safety evaluations, vendor correspondence, and other historical design information.

Our commitment to continue the SSFA program with at least one SSFA per year remains unchanged. An SSFA of the Reactor Coolant System was completed in 1997. The Weld Channel Penetration Pressurization System and Isolation Valve Seal Water System was assessed in 1998.

Our commitment to develop and implement a training module to increase the awareness of the significance of licensing / design basis information was completed in 1997. Several training classes to increase personnel awareness of design basis information were conducted. Additional training was provided to engineering personnel through the continuing training program in 1998. Classes to familiarize plant personnel with the search and access capabilities of the design bases information databases were initiated in late 1998.

Additions to the Original Programs

During the course of the UFSAR verification review, we recognized the need to also review licensing basis information. In the fall of 1998 a project to review licensing records, docketed correspondence and historical commitments was funded and awarded. The results of this review will involve changes to the current UFSAR. Because of the synergy of this review with the ongoing UFSAR verification project, these activities were organizationally aligned under Configuration Management. This organization oversees both the UFSAR and DBD efforts.

Changes to Con Edison's Commitments

Con Edison's commitment to enhance the overall accessibility of the UFSAR, we believe, has been essentially completed and the intent of the commitment met. With the development of the IP-2 website, far more design basis related information is now accessible to plant personnel. Because the IP-2 website database and other design basis information sources are now available and given our program of continuing to add new information, the February 1999 commitment completion date is no longer of significance in this area.

Our program to verify the accuracy of UFSAR design basis information, as originally committed to in our February 13, 1997 response, has proven to be far more extensive than originally understood. As UFSAR verification information is provided to us from project contractors for review, this effort, along with the concurrent review of new DBDs, is proving to be extensive and time-consuming. As a result, the February 1999 completion date for UFSAR verification program cannot be met. To date approximately 65 % of UFSAR segments have gone through the verification process and are currently being reviewed by Con Edison personnel. Approximately 600 discrepant conditions have been identified and entered into our corrective action program, the Condition Reporting System (CRS). Each condition is prioritized, assigned for resolution, and scheduled for corrective action implementation. To the extent practical, we will incorporate as many of these resolutions into the next UFSAR update, scheduled for submittal to the NRC in

December 1999. We expect to complete the UFSAR segment verification process (i.e., either verify the segment or enter the discrepant condition into CRS), with the exception of a small portion of design requirement segments (less than 10 %), by December 31, 1999. The design requirement segments will need to be addressed in conjunction with the ongoing program to upgrade DBDs. In addition, we have been monitoring and participating in industry / NRC activities related to updating UFSARs. We understand that the NRC will issue generic guidance on this subject later in the year. We intend to comply with the timeframe allowed in the proposed NRC guidance once it is finalized.

The writing and updating of the Design Basis Documents was originally scheduled for completion by February 1999. Delays encountered due to the recently completed prolonged maintenance outage will result in the establishment of a new commitment completion date. Work has begun on NSSS and BOP DBDs, and our current project schedule indicates issuance of six (6) DBDs by July 1, 1999; completing six (6) new DBDs by the end of 1999, 2000 and 2001; and three (3) by the end of 2002.

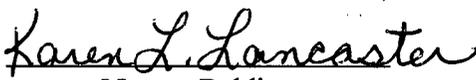
Although these DBD completion dates require extension, progress toward our committed goal has remained steady and dedicated. There has been a continuous dedication of resources required to complete this work. The lessons learned during the recent outage brought about a greater realization of what is required to ensure that the licensing and design basis are well documented, accurate, and understood. As a consequence, we are now better prepared to complete this DBD initiative as initially intended.

Regulatory commitments being made by Con Edison in this correspondence are summarized in the enclosure. Should you or your staff have any concerns regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing.

Very truly yours,



Subscribed and sworn to
Before me this 17th day
of February, 1999.


Notary Public

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ENCLOSURE

LIST OF COMMITMENTS

The following list identifies those actions committed to by Con Edison in this document. Any other actions discussed in the submittal represent intended or planned actions by Con Edison. Such other actions are described to the NRC for the NRC's information and are not to be deemed regulatory commitments. Please notify Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing of any questions regarding this document or any associated regulatory commitments.

<u>Commitment</u>	<u>Due Date</u>
Complete the UFSAR segment verification process (i.e., either verify the segment or enter the discrepant condition into CRS) with the exception of the design requirement segments.	December 31, 1999
Issue six (6) DBDs	July 1, 1999
Issue six (6) DBDs	December 31, 1999
Issue six (6) DBDs	December 31, 2000
Issue six (6) DBDs	December 31, 2001
Issue three (3) DBDs	December 31, 2002
Establish a process to add future licensing correspondence onto the website, as well as the remaining correspondence from 1997 to the present.	December 31, 1999
Verify that the electronic version of the UFSAR contained on the website accurately reflects the controlled hard copy version.	December 31, 1999