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December 1, 1998

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: Reply to Response Requested in IR50-247/98-16  
Future Replacement Schedule for FCU HEPA Filters

NRC Special Inspection Report 50-247/98-16 requested that Con Edison inform the NRC of the future replacement schedule for Fan Cooler Unit (FCU) High Efficiency Particulate Air (HEPA) filters and the basis for establishing that schedule. Our response is contained in Attachment A.

The commitments made in this correspondence are provided in Attachment B.

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

Very truly yours,



cc: Mr. Hubert J. Miller  
Regional Administrator - Region I  
US Nuclear Regulatory Commission  
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## ATTACHMENT A

The replacement schedule for the HEPA filters on the five (5) containment fan cooler units (FCU) is:

22 FCU	Replaced September, 1998.
25 FCU	Replaced September, 1998.
21 FCU	Scheduled for replacement during the 2000 refueling outage. The bottom three (3) rows will be replaced prior to December 31, 1998.
24 FCU	Scheduled for replacement during the 2000 refueling outage. The bottom three (3) rows will be replaced prior to December 31, 1998.
23 FCU	Scheduled for the currently planned refueling outage 2002.
22 FCU	Scheduled for the currently planned refueling outage 2004.
25 FCU	Scheduled for the currently planned refueling outage 2004.
21 FCU	Scheduled for the currently planned refueling outage 2006.
24 FCU	Scheduled for the currently planned refueling outage 2006.
23 FCU	Scheduled for the currently planned refueling outage 2008.

The above schedule will be repeated as long as the HEPA filters are required to be in the FCUs. A Technical Specification amendment request has previously been submitted which would permit the permanent removal of all of the HEPA filters from the FCUs, and this amendment request is currently being processed by NRR.

The basis for the filter replacement frequency was determined using information from the root cause analysis of the CRS event which documents the failure of one HEPA filter and the degradation of several other filters. According to the analysis, the failed and degraded filters were manufactured by Flanders Filters Inc. and were known as type "8" filters (which have been discontinued by Flanders). Those filters were installed in 1991.

Included in the analysis were Flanders type "F" filters (which replaced the type "8") and filters manufactured by American Air Filter (AAF). This second group of filters was removed from other FCUs and showed no signs of degradation but had less service time than the type "8" mentioned above. The analysis showed that the improved Flanders filter (type "F") and the AAF filters were reinforced and therefore are more resistant to the type of failure seen with the Flanders type "8". There are no type "8" filters currently installed in any of the FCUs.

The above filter replacement schedule is based on the following:

Analysis performed during the investigation of the event indicates that the improved filters will have a longer life under the same exposure as the failed filter. Future replacement will be performed with Flanders type "F" (or better) and/or AAF filters.

One of the contributing factors to the filter failure (operating without roughing filters during outages) will be procedurally eliminated, improving service conditions.

Using lessons learned from the event, the visual filter inspection (performed every outage as part of a surveillance test) will be enhanced to provide improved guidance for visual filter inspection. Therefore there will be less likelihood of precursor indications of filter degradation escaping detection.

ATTACHMENT B

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. These other actions are described to the NRC for the NRC's information and are not regulatory commitments. Please notify Mr. Charles Jackson, Manager Nuclear Safety & Licensing of any questions regarding this document or any associated regulatory commitments.

<u>Commitment</u>	<u>Due Date</u>
21 FCU - replace bottom three (3) rows of HEPA filters	12/31/98
24 FCU - replace bottom three (3) rows of HEPA filters	12/31/98
21 FCU - replace all HEPA filters	RFO 2000*
22 FCU - replace all HEPA filters	RFO 2004*
23 FCU - replace all HEPA filters	RFO 2002*
24 FCU - replace all HEPA filters	RFO 2000*
25 FCU - replace all HEPA filters	RFO 2004*
The installation of roughing filters prior to start of work in containment when the unit is at the cold shutdown condition will be proceduralized.	12/31/98
The refueling surveillance test containing the visual filter inspection will be enhanced to include lessons learned from this event.	12/31/98

NOTE - A Technical Specification amendment request has previously been submitted to NRR which would permit the permanent removal of all FCU HEPA filters.

\* as currently scheduled