

Stephen B. Bram
Vice President

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(54 FR 52946)

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DOCKETED
USNRC

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

March 9, 1990

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

90 MAR 19 P3:5

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
US Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

SUBJECT: NRC Proposed Rule Amending Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events

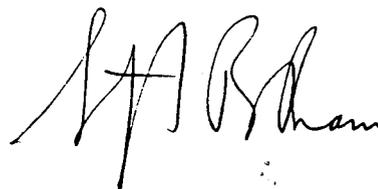
Dear Sir:

Consolidated Edison Company of New York, Inc., as owner and operator of Indian Point Nuclear Generating Station Unit No. 2, provides the following comments on the subject proposed rule.

Regulatory Guide 1.99 provides guidance to licensees for complying with the requirements of 10 CFR 50 Appendix G, regarding normal heatup and cooldown limitations for iterations within the control of the operator. The Pressurized Thermal Shock (PTS) rule (10 CFR 50.61), however, is intended to address limits associated with hypothetical accident transient conditions. Thus, the calculational methods and criteria differ significantly for the normal versus accident situations. Application of new, more conservative calculational techniques to the normal heatup and cooldown limitations addressed by Regulatory Guide 1.99, as contemplated by the proposed rule, will necessarily cause a further narrowing of the operating window, as recognized by Generic Letter 88-11. For this reason, any utilization of the NRC's proposed application of Regulatory Guide 1.99, Rev. 2 in the calculation of RT_{PTS} for compliance with the PTS rule for hypothetical accidents would be inappropriate without a concurrent re-evaluation by the NRC of the cumulative and additive effects of the overall conservatism underlying the analytical bases for the PTS rule. This re-evaluation should also consider appropriate revisions to the PTS screening criteria. Only then can a valid re-evaluation of remaining vessel service life be conducted.

We appreciate this opportunity to provide comments on the proposed rule.

Very truly yours,



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