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Syed K. Slaukat
56FR16130

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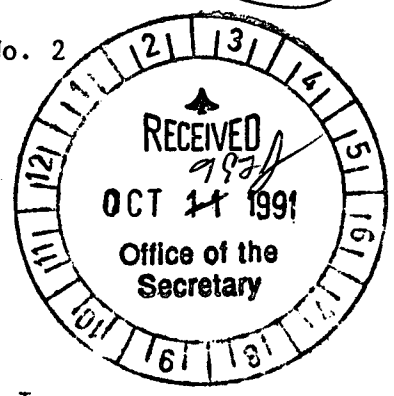
September 30, 1991

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



Mr. Samuel S. Chilk
Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555
Attn.: Docketing And Service Branch

SUBJECT: Solicitation of Public Comments on Generic Issue 23 "Reactor Coolant Pump Seal Failure", and Draft Regulatory Guide; Issuance, Availability.

Dear Mr. Chilk:

In response to the solicitation of public comments on the subject matter, and the associated draft regulatory Guide, as reflected in the Federal Register Notice 56 FR 16130, dated April 19, 1991, we offer the following comments:

The regulation and justifying basis proposed for the resolution of this issue, is in our view without merit. The basis for this conclusion parallels those provided in both the Westinghouse Owners Group (WOG) and the Nuclear Management and Resources Council (NUMARC) response on this matter.

Within the WOG response on this matter, are summaries of the members response to the questions contained in the Federal Register Notice. In our view, this information clearly indicates an improvement in Reactor Coolant Pump (RCP) seal operating experience. We have, in our own efforts at Indian Point 2, realized this improvement along with the rest of the industry, and are continuing to strive for even better RCP seal reliability through ongoing WOG efforts.

One of the measures implemented over the years at Indian Point 2 is the classification of the RCP seals as safety grade. Thus the requirements of 10 CFR 50 Appendix B have already been imposed on this component at our facility. We are therefore currently in compliance with one of the proposed actions for resolution of this issue reflected in Draft Regulatory Guide DG-1008. The WOG and NUMARC response seemingly indicate that we are not unique in this, and other equally effective, voluntary actions which clearly reveals Con Edison's heightened awareness of the safety significance of RCP seal failures. Thus the benefits to be derived from the generic implementation of 10 CFR 50 Appendix B requirements have already been realized at Indian Point 2. We consequently do not see any need for further regulatory action in regard to this matter.

In the case of the NRC's other proposed actions to mitigate the potential for RCP seal leakage during normal operating conditions, requiring RCP manufacturer recommended instrumentation and instructions for monitoring RCP seal performance and detecting incipient RCP seal failures, we have provided plant specific details in the WOG submittal. The details provided essentially reveal that for our facility, adequate guidance is provided to the operator for both normal and off-normal conditions that potentially could adversely impact RCP seals. In addition, adequate instrumentation to both detect and monitor RCP seal incipient failure and performance are already in place at Indian Point 2. These instruments provide the operator with sufficient information to implement the procedural requirements in regards to normal and off-normal plant events. These existing instruments and plant procedures are consistent with Westinghouse current information and maintenance practices for the seals.

Consequently, we see no need for any additional instrumentation or procedural requirement, beyond those currently in place. We are self motivated in recognizing the need to maintain good operating practices and proper instrumentation in this area, and will continue to be so because, aside from the obvious safety benefits, it is also the prudent thing to do.

In regards to the third and final NRC proposal action as reflected in DG-1008, regulatory position C.3 requiring independent seal cooling as a safeguard against any of the identified off-normal occurrences adverse to seal integrity, we are of the same opinion as those expressed in NUMARC's submittal on this matter. Our estimated cost to implement the least costly NRC proposed modification (i.e., CCW/FP intertie) ranges from two to six million dollars. This is significantly more than the $273k/plant estimated by the NRC for this modification. Based on our experience we do not believe this cost is justified. For our facility, we have experienced approximately six spurious SI signals since 1983 culminating in the degradation/loss of both seal injection and CCW flow (i.e., equivalent to station blackout event). Adequate cooling was re-established within seconds of the initiation of these events. The specifics of these events and others are reflected in the WOG submittal on this matter. Con Edison has not experienced a seal failure since 1983, after the initiation of a two cycle inspection frequency for the RCP seals.

Our experience with seal leakage since 1983 has resulted in only two events (2/83 & 6/89) in which seal leakage exceeded the manufacturers recommendations. In no instance were the leakages beyond plant makeup capability. The former event was attributed to excessive wear and the latter occurred after seal replacement during Reactor Coolant System (RCS) heatup from a refueling outage and was attributed to a maintenance/manufacturer deficiency. None of these potentially significant events were attributed to any failure of our existing seal cooling.

Therefore in view of the above, we perceive no significant benefit to be gained in the installation of an independent or backup seal cooling

In summary, we support the positions taken by both WOG and NUMARC on the subject matter, concluding that the NRC has not provided sufficient basis in the supporting reference documents for the proposed resolution of this issue. We have experienced significant improvements in RCP seal reliability since 1983, through our own and other collective industry efforts. From our perspective, improvements to seal package design are currently available that offer better cost/benefit ratio and improvement to seal reliability. We have always implemented these vendor enhancements in a timely manner and believe that additional requirements will only increase cost without a concomitant improvement in seal reliability.

Very truly yours,

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