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62 FR 27629
May 20, 1997

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RULES & DIR. BRANCH
US NRC

June 19, 1997

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

Chief, Rules Review and Directives Branch
Nuclear Regulatory Commission
Mail Station T-5D-59
Washington, DC 20555-0001

SUBJECT: Comments on Bulletin 96-01, Supplement 1; Control Rod
Insertion Problems

Consolidated Edison Company of New York, Inc. (Con Edison), owner and operator of Indian Point Unit No. 2 (IP-2), is pleased to comment on the proposed Supplement 1 to Bulletin 96-01 as set forth at 62 Federal Register 27629 dated May 20, 1997.

Con Edison endorses the comments being submitted by the Westinghouse Owners Group (WOG) Letter OG-97-061 dated June 18, 1997. In addition, we offer the following additional comments:

1. The additional startups and shutdowns necessary for the testing required by the proposed Supplement 1 would result in unnecessary waste water processing, radioactive waste production, and radiation exposure. Although such operation is bounded by the safety analyses contained in the IP-2 Updated Final Safety Analysis Report, such additional operations are not warranted.
2. The IP-2 core designs typically contain at least 1500 pcm excess shutdown margin beyond that required by plant Technical Specifications, more than compensating for any concern with regard to incomplete control rod insertion problems.
3. Between 1995 and 1997, IP-2 has successfully conducted four rod drop tests which met plant Technical Specification drop time requirements. In addition two drag tests were conducted in 1997 and the results were well within the Westinghouse F-Spec criteria. The first drag test was performed on rodded 15 X 15 OFA 9 grid assemblies with burnups to 49,700 MWD/MTU. The second drag test was performed on rodded Vantage + 9 grid assemblies with IFMs (i.e., 12 grids), with burnups to 27,500 MWD/MTU.

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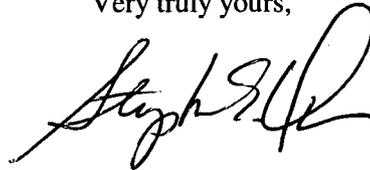


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4. Bulletin 96-01 discusses problems with fuel types other than any ever used at IP-2. IP-2 has Westinghouse 15 x 15, 9-grid fuel assemblies, transitioning from OFA to Vantage + with IFM grids. Supplement 1 does not reflect the advantages of the IP-2 fuel design. Therefore, there is no basis in the bulletin for extending this issue to the IP-2 fuel design.

We appreciate the opportunity to comment on this important matter. Should you have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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