

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N Y 10003
Telephone (212) 460-3819

June 6, 1980

Re: Indian Point Units No. 1 & 2
Docket Nos. 50-3 & 50-247

Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa 19406

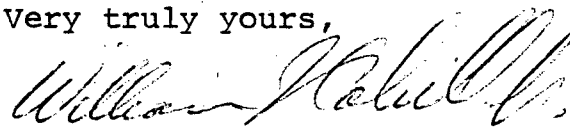
Dear Mr. Grier:

Our response to IE Bulletin No. 80-12 for Indian Point Unit No. 2 is provided in the Attachment to this letter. This information is being provided pursuant to 10 CFR 50.54(f).

With respect to Indian Point Unit No. 1, the unit was shut-down on October 31, 1974 and is presently in the defueled condition. It has been determined that the subject of this bulletin is not applicable to Indian Point Unit No. 1.

Should you or your staff have any further questions, please contact us.

Very truly yours,



William J. Cahill, Jr.
Vice President

attach.

Subscribed and sworn to
before me this 6th day
of June, 1980.



Notary Public

ANGELA ROBERTI
Notary Public, State of New York
No. 41-8593813
Qualified in Queens County
Commission Expires March 30, 1982

cc: Office of Inspection and Enforcement
Division of Reactor Operations Inspection
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. T. Rebelowski, Resident Inspection
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

ATTACHMENTItem 7

Report to the NRC within 30 days of the date of this Bulletin the results of the above reviews and analyses, describing:

- a. Changes to procedures (e.g., emergency, operational administrative, maintenance, refueling) made or initiated as a result of your reviews and analyses, including the scheduled or actual dates of accomplishment; (Note: NRC suggests that you consider the following: (1) limiting maintenance activities to assure redundancy or diversity and integrity of DHR capability, and (2) bypassing or disabling, where applicable, automatic actuation of ECCS recirculation in addition to disabling High Pressure Injection and Containment Spray preparatory to the cold shutdown or refueling mode.)
- b. The safeguards at your facility(ies) against DHR degradation, including your assessment of their adequacy.

Response
Item 7a

We have completed the review and analyses required by the subject bulletin.

Existing Indian Point 2 procedures have considered the potential for loss of the normal Decay Heat Removal Systems and do provide for adequate alternate means for removal of Decay Heat.

In order to provide added assurance against loss of Decay Heat Removal capability, additional administrative controls were implemented on June 3, 1980. These controls require:

- 1 - An alternate Decay Heat Removal means be available prior to removing any component from service that would reduce the required redundancy of the normal Residual Heat Removal System.
- 2 - An alternate Decay Heat Removal means be made available as soon as possible following failure of any component that reduces the required redundancy of the normal Residual Heat Removal System.

Our existing procedures have requirements to disable automatic actuation of the ECCS preparatory to entering the cold shutdown or refueling modes. These procedures include disabling High Pressure Injection and Containment Spray. These procedures have been reviewed and no changes are deemed necessary.

It should be noted that the design of Indian Point Unit No. 2 does not incorporate automatic actuation of the ECCS recirculation mode, thereby precluding the type of DHR loss event experienced at Davis-Besse Unit 1. Specifically, no automatic actuation circuitry exists at Indian Point Unit No. 2 that could result in the residual heat removal pumps taking suction from a dry containment sump and thereby requiring an excessive time interval to vent the system.

Item 7b

When in the cold shutdown and refueling modes, normal DHR capability is provided by the Residual Heat Removal System. This system includes redundant pumps and heat exchangers. The residual heat removal heat exchangers are in turn serviced by the component cooling system which includes redundant pumps and heat exchangers. The cooling for the component cooling heat exchangers is provided by redundant pumps in the Service Water System.

When reactor coolant temperature is above the design conditions of the Residual Heat Removal System, DHR capability is normally provided by the steam generators utilizing redundant auxiliary feed water pumps supplied from the condensate storage tank.

In the unlikely event of loss of the normal DHR equipment described above, DHR capability can be provided as described below:

1 - Cold shutdown and refueling modes:

a - Reactor Coolant System Closed

DHR capability is provided using the steam generators and the Auxiliary Feed Water System.

b - Reactor Vessel Head Removed (Refueling)

DHR capability is provided by filling the reactor cavity (if not already filled) from the Refueling Water Storage Tank (RWST) using redundant safety injection pumps or redundant charging pumps. Borated makeup water to the cavity may then be provided from the Boric Acid Makeup System.

An alternate DHR method utilizes transfer of reactor cavity borated water to the recirculation sump in conjunction with one of the two redundant recirculation pumps to transfer this borated water through either residual heat exchanger to the RCS. In this mode, heat removal from the recirculated water can be accomplished using either the residual heat exchangers or the containment fan cooler units.

c - Reactor Coolant System Open But Vessel Head In Place (Steam Generator Maintenance Mode).

DHR capability is provided by filling the RCS sufficiently, using borated makeup water, to establish a flow path from the RCS opening to the recirculation sump. One of the two redundant recirculation pumps are then used to transfer this borated water through either residual heat exchanger to the RCS. In this mode, heat removal from the recirculated water can be accomplished using either the residual heat exchangers or the containment fan cooler units.

2 - Reactor coolant temperature above Residual Heat Removal System design conditions.

DHR capability is maintained in the event of loss of all auxiliary feed water pumps using an alternate makeup water supply provided by the main condensate pumps.

In the event of loss of the Condensate Storage Tank a backup water supply is provided by the city water storage tank to maintain DHR capability.

Electric power for the 480v AC auxiliary equipment used for DHR may be supplied by offsite AC power or onsite diesel generators backed up by gas turbine generators.

Based upon our reviews and analyses, we conclude that the existing Indian Point No. 2 design and procedures provide adequate assurance against loss of Decay Heat Removal capability.