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September 20, 1991

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: NRC Bulletin No. 89-01, Supplement 2: Failure of  
Westinghouse Steam Generator Tube Mechanical  
Plugs, dated June 28, 1991

This letter is in response to the subject NRC Bulletin. Con Edison is able to confirm the number of Westinghouse mechanical plugs in the hot-leg and cold-leg side of each Indian Point 2 steam generator, categorized by heat number and date of installation, as reported in Table 2 of WCAP-12245 Revision 3, addendum 2, with one exception. As to those plugs characterized as plug heat 4523, 8 (rather than 9) plugs are currently installed in the hot leg of steam generator 22. Although 9 plugs were installed in April of 1989, one plug was removed during the 1991 refueling outage and replaced with an alloy 690 plug. Thus the "Plugs Removed" column should also be corrected.

In addition, there are other errors in the table. The "Plugs Repaired" column under "Status" does not reflect the extensive remedial action undertaken during the 1991 refueling outage. During the outage, Westinghouse "PIPs" and B&W "PAPs" were installed in previously plugged tubes whose remaining life extended to the year 2001, with two exceptions. As explained in our letter of May 8, 1991, on this subject, special circumstances precluded repair of one plug of heat 3962 installed in January of 1986 in steam generator 24. This repair effort is now scheduled for the next refueling outage in 1993. Secondly, the 37 plugs that were installed in April of 1989 in steam generator 22 were not repaired during the 1991 outage; these do not require further effort until the year 2000 due to their reported remaining life.

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The above discussion satisfies item 1 in the subject Bulletin. As can be seen, the repair action undertaken by Con Edison goes far beyond that required by item 2 a) of the Bulletin. Except for the two noted exceptions, action has been taken for all plugs with remaining lifetimes through the year 2001. Only one plug needs to be addressed in the 1993 outage and none earlier, regardless of whether an outage is encountered in the interim. In response to item 2 d), Con Edison has discontinued installation of plugs fabricated from Inconel 600. As to ALARA responsibilities, these concerns are factored into our plug repair efforts. It was a key factor in deferring the repair of one plug until 1993.

We trust that this letter has been responsive to the subject NRC Bulletin. Should there be any questions, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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