

William J. Cahill, Jr.
Vice President

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

January 9, 1979

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

Director of Nuclear Reactor Regulation
ATTN: Mr. A. Schwencer, Chief
Operating Reactors Branch No. 1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Schwencer:

We hereby transmit, as Attachment A to this letter, our response to your letter dated November 28, 1978.

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

Very truly yours,

William J. Cahill, Jr.
William J. Cahill, Jr.
Vice President

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ATTACHMENT A

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2

Docket No. 50-247

January, 1979

A. Containment Purging During Normal Plant Operation:

The Indian Point Unit No. 2 Containment Purge System and the associated containment isolation provisions are described in Sections 5.2.2 and 5.3.2 of the FSAR. The redundant 36-inch containment isolation valves in both the purge supply and exhaust ducts are normally maintained in the closed position during reactor power operation. The Containment Purge System is used for containment atmosphere cleanup, cooldown and ventilation immediately prior to and during shutdown modes when containment personnel access is required. In addition, the purge system may be utilized to facilitate containment personnel access at those infrequent instances when containment entry during reactor power operation may be necessary.

However, your November 28, 1978 letter has defined "limited purging" as not more than 90 hours purging per year when the reactor is in other than a cold shutdown condition. Since this limitation is impractical and represents an unreasonable restriction on plant operations, we must select option (3) of your letter and, accordingly, plan to justify "unlimited purging". As required by option (3), we will conduct a detailed evaluation of the Containment Purge System and will respond to the issues contained in Standard Review Plan 6.2.4, Revision 1, and the associated Branch Technical Position CSB 6-4 by May 1, 1979.

During reactor power operation, there is a need to provide periodic containment pressure relief to compensate for air leakage into containment from various instrument air and weld channel and containment pressurization system sources. As described in FSAR Sections 5.2.2 and 5.3.2, the 10-inch Containment Pressure Relief Line, not the Containment Purge System, is utilized to periodically relieve containment pressure buildup during reactor power operation. Note that this line simply provides a pressure relief capability and does not incorporate the normal ventilation functions of fresh air intake and air circulation that the Containment Purge System does. The acceptability of pressure relief during power operation has also been documented in a number of other docketed references. Applicable discussions are contained in the responses to Indian Point Unit No. 3 FSAR questions Q 11.2 and Q 5.14. In addition, present plant operating conditions are consistent with those conditions considered by the Commission in NUREG-0017 (April, 1976). Furthermore, the 10CFR50, Appendix I, evaluation for Indian Point Unit No. 2, submitted in March, 1977, assumed continuous pressure relieving in the offsite dose calculations.

Finally, we have reviewed the instrumentation and control circuitry for the containment pressure relief line isolation valves as well as for the containment purge system isolation valves. As stated in the Indian Point Unit No. 2 FSAR, these valves are actuated to the closed position automatically upon a containment isolation signal or a containment high radiation signal. Manual bypass of either signal does not affect the availability or operation of the other signal. The events at Millstone Unit 2 and Salem Unit 1 described in your November 28, 1978 letter cannot occur at Indian Point Unit No. 2 with the present electrical design.

In conclusion, it is our position that present containment purging and pressure relieving practices are documented and have been reviewed and accepted, and no change or new operational commitments are necessary at this time.

2. Safety Actuation Electrical Circuitry
Manual Override Capability Review:

In addition to the review of safety-related electrical systems conducted at the FSAR review stage for Indian Point Unit No. 2, a number of detailed rereviews were conducted just prior to and during the first refueling outage of the unit (1976). These rereviews were conducted as part of the required submerged electrical component study, the reevaluation of the Containment Isolation System design and testing provisions (Appendix J), and the electrical single failure review to satisfy 10 CFR 50.46 and Appendix K to 10 CFR 50. As a result of these studies, a number of hardware and software changes were effected to upgrade various features of the Indian Point Unit No. 2 safety-related circuitry.

Your November 28, 1978 letter has requested another rereview of safety-related electrical circuitry based on new criteria and assumptions. Accordingly, we have initiated an in-depth review to fully respond to your request. However, since this effort requires an extensive, multi-discipline review of all Indian Point Unit No. 2 safety-related electrical circuits and plant operations, it cannot be completed within a 30-day period. Upon completion of our preliminary review and establishment of the overall scope of the review effort, we will provide a schedule for the completion of our review and submittal of the results. We will periodically inform your Project Manager as to the status of the preliminary review until our formal schedule is submitted.

To date, we have not found any non-conforming circuits and, as stated earlier, have already reviewed the containment purge system and containment pressure relief line control circuits and found them acceptable. Should the further checks you have requested uncover any non-conforming circuitry, we will immediately take whatever action is necessary to prevent the potential development of an unsafe or unanalyzed condition. Any such items will be included in a future supplementary response to your November 28, 1978 letter.

Based on the extensive reviews and rereviews of the Indian Point Unit No. 2 safety-related electrical circuitry conducted in the past and the upgrading of plant operations based on those reviews, we believe that operation of a bypass will affect no safety functions other than those analyzed and discussed on our dockets. Accordingly, no revisions to our current administrative controls appear necessary to meet the requirements of your November 28, 1978 letter.