

WEST BRANCH CONSERVATION ASSOCIATION

443 BUENA VISTA ROAD
NEW CITY N Y 10956

September 19, 1984

EXPRESS MAILHon. Commissioners
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555Dear Commissioner *Pellegrino*:

Re: 50-247-SP

We received transcripts and letter copies of BN-84-146 and BN-84-154 regarding a flaw or crack in the weld of the pressure vessel.

In response we, along with the County of Rockland and Lt. Gov. Alfred Del Bello have called for an independent inspection and appraisal of the methods used and the assumptions made about the condition.

Since the nuclear experience is relatively young, in calling for independence we mean those who are not employed in the industry and those who do not regularly make studies for the government or Nuclear Regulatory Commission.

We believe we have located two teams that would qualify and suggest that you speak to them about their services to ascertain if they are more independent than those who are now on the job.

Mr. Steven Lunn, C.T.Morgan Co., Danvers, Mass. Mr. Morgan pioneered 17 years ago in ultra sound inspection. Telephone (617)774-3215.

Mr. Tom Payne and Mr. Chas. Heller, Bestco, Essex, Connecticut. Telephone (203)767-2113.

These companies were suggested to us by members of the American Welding Society who do eddy current testing.

Sincerely yours,

*S. Fleisher*Z. S. Fleisher
Secretary8410190364
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Introduced by:

Hon. E. Cornell
Hon. E. Clark

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Referral No.
September 4, 1984

RESOLUTION NO. 615 OF 1984
REQUESTING THE HON. MARIO CUOMO, GOVERNOR OF
THE STATE OF NEW YORK, TO APPOINT A QUALIFIED TECHNICAL
EXPERT, INDEPENDENT OF BOTH THE NUCLEAR INDUSTRY
AND THE NUCLEAR REGULATORY COMMISSION,
TO REPRESENT THE PUBLIC INTEREST.

Cornell/Clark, unanimous

WHEREAS, recent ultrasonic testing of the reactor vessel of Indian Point 2 indicates the presence of a possible crack, and

WHEREAS, the Nuclear Regulatory Commission states that it will not allow the plant to reopen until a detailed analysis of the flaw has been made and calculations made on whether this crack in the reactor vessel will affect its ability to withstand stresses of rapid changes in temperature or pressure, as required by the Nuclear Regulatory Code, and

WHEREAS, the Lieutenant Governor of the State of New York, Alfred Del Bello, has expressed deep concern and has called publicly for an assessment of this situation by a qualified independent engineering firm, and

WHEREAS, the Rockland County Legislature has consistently concerned itself with the safety of Rockland County residents, and

WHEREAS, in order to ensure public confidence that the problem is being evaluated objectively and competently, a qualified technical expert, independent of both the nuclear industry and the Nuclear Regulatory Commission, should be appointed to assess this situation, now, therefore, be it

RESOLVED, that the Rockland County Legislature does hereby request the Governor of the State of New York, Hon. Mario Cuomo, to appoint a qualified technical expert, independent of both the nuclear industry and the Nuclear Regulatory Commission, to evaluate all the data, attend pertinent meetings, and in all ways serve as the public's watchdog, and be it further

RESOLVED, that the Clerk to the Legislature be and is hereby authorized and directed to send a certified copy of this resolution to the Hon. Mario Cuomo, Governor of the State of New York; Hon. Alfred Del Bello, Lt. Governor of the State of New York; Hon. Linda Winkov, New York State Senator; Hon. Eugene Levy, Hon. Robert Connor and Hon. William Ryan, New York State Assemblymen and Hon. Mary Margaret McPhillips, New York State Assemblywoman; the Majority and Minority Leaders of the New York State Senate and Assembly; to the officials of NREA, FEMA, NRC and Con Edison, and to such other persons as the Clerk

October 4, 1984

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

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Dear Mr. Varga:

Consolidated Edison and our consultants appreciated the opportunity to meet with the NRC staff on Wednesday October 3, 1984 to discuss the results of our several investigations and evaluations of the ultrasonic indication detected during the recent ten year inservice inspection of the Indian Point Unit No. 2 reactor vessel.

We believe that the information provided the staff relating to this issue, in several meetings and three separate submittals has demonstrated that the indication is without significance from an operating or safety standpoint. We wish to reemphasize that the fracture mechanics evaluation we transmitted by letter dated September 7, 1984 concluded that a hypothetical flaw considerably larger than the measured indication would not require repair, nor affect the operational characteristics of the reactor vessel in any way. The evaluation of the larger hypothetical flaw conservatively bounds that of the actual indication including realistic assessments of the uncertainties associated with the ultrasonic sizing techniques.

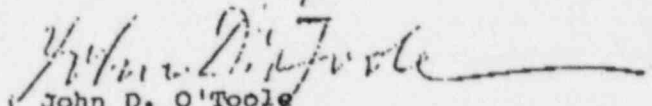
We believe we have satisfactorily responded to the staff's requests for additional information and demonstrated that the reactor vessel can be safely returned to service. Accordingly, we request your concurrence to proceed to temperature and pressure in preparation for hydrostatic testing of the reactor coolant system and subsequent return to power operation.

~~84-216046P~~

We anticipate commencing with hydrostatic testing immediately upon receipt of your concurrence.

The confirmatory information requested by the staff during our October 3, 1984 meeting is in preparation and will be forwarded shortly. Should you or your staff have any additional questions, please contact us.

Very truly yours,


John D. O'Toole
Vice President



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

October 4, 1984

Docket No. 50-247

Mr. John D. O'Toole
 Vice President
 Nuclear Engineering and Quality Assurance
 Consolidated Edison Company
 of New York, Inc.
 4 Irving Place
 New York, New York 10003

Dear Mr. O'Toole:

We have received your letter requesting our concurrence to proceed to non-nuclear heat-up to temperature and pressure in preparation for hydrostatic testing of the reactor coolant system and then to subsequent return to power operation.

As discussed in our meeting on October 3, 1984, we have not yet completed our review and evaluation of the information you have provided concerning your investigation and evaluations of the ultrasonic indication of the Indian Point Unit 2 (IP-2) reactor vessel. Therefore, pending completion of our review, we are not in a position to approve return to nuclear power operation of Indian Point Unit 2.

However, the staff considers the risk of IP-2 vessel fracture as a result of hydrostatic testing negligible, because the heat-up and actual test must be performed in accordance with the safety margins of Appendix G, 10 CFR 50. The crack size that this appendix requires to be included in determining the allowable test pressures and temperatures is $1/4t$ (approximately 2.2 inches) in depth and $3/2t$ (approximated 13.2 inches) in length. Since the crack size considered in establishing the Appendix G hydrostatic test pressures and temperatures is significantly greater than the indication believed to be in the IP-2 vessel, the hydrostatic test of the vessel in accordance with the Appendix G limits will provide adequate protection against fracture of the vessel.

We concur in your proceeding to hydrostatic testing and non-nuclear operation up to and including, but not exceeding, hot shutdown conditions with the reactor sub-critical as defined in Section 1.2.2 of the IP-2 Technical Specifications.

Steven J. Varga, Chief
 Operating Reactors Branch #1
 Division of Licensing

cc:
 See next page

~~50-240113~~