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April 18, 2000

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

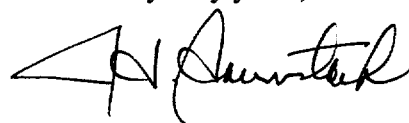
SUBJECT: Inservice Testing Program Relief Request for Valves

Pursuant to the requirements of 10 CFR 50.55a(a)(3)(ii) and Indian Point Unit 2 Technical Specification 4.2.1, Consolidated Edison Company of New York, Inc. (Con Edison) hereby submits a one-time only relief request to the ASME Boiler and Pressure Vessel Code, Section XI test requirements pertaining to the testing of the Main Steam safety valves. As a result of the re-scheduled start date of the 2000 refueling outage, Con Edison has determined that compliance with specific Code requirements to obtain "as found" valve data would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

No new regulatory commitments are being made by Con Edison in this correspondence.

Should you or your staff have any concerns regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing.

Very truly yours,



Attachment

A047

C: Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey F. Harold, Project Manager
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US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
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RELIEF REQUEST BASIS

SYSTEM:

MS

VALVES:

MS-45A,C
MS-49A

FUNCTION:

These are ASME Code Class Valves.

These valves are spring-loaded safety valves with hand operated lifting levers installed for testing. The safety function of these valves is to open.

TEST REQUIREMENT:

ASME/ANSI OM (Part 1), Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices, Paragraph. 7.3 (Periodic Testing)

BASIS FOR RELIEF:

On February 15, 2000, the Indian Point Unit 2 plant was manually shut down due to a primary to secondary steam generator leak. Prior to this event, preparations were established to begin a refueling outage, no later than June 3, 2000. Because of the extensive maintenance activities associated with the steam generators, Con Edison has decided to initiate refueling operations at this time.

ASME/ANSI OM (Part 1), Paragraph 7.3, Periodic Testing, stipulates that, "No maintenance, adjustment, disassembly, or other activity which could affect "as found" set pressure or seat tightness data is permitted prior to testing." To comply with this specific requirement, Con Edison normally obtains this "as found" valve data immediately following plant shut down and prior to entry into cold shutdown conditions. The present plant conditions do not permit the performance of testing required to obtain this data. The main steam safety valves identified above are scheduled for maintenance during the current refueling outage.

At this time, compliance with the requirements of the ASME Code would result in hardship without a compensating increase in the level of quality or safety.

ALTERNATIVE TESTING:

The valves required to be tested during this period will be tested prior to return to service from the 2000 refueling outage.