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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: Pending Unavailability of the 13.8 kV Source of Power for more than 24 hours
with the Unit at Power

In accordance with Technical Specification 3.7.B.3, this letter is being submitted to report the pending unavailability of the 13.8 kV source of power for the 6.9 kV buses for more than 24 hours with the unit at power. The unavailability of the 13.8 kV source of power will occur both prior to and following the replacement of the existing 20 MVA 13.8 kV/6.9 kV output transformer for Gas Turbine (GT) 1. This replacement of the GT1 transformer is planned with Indian Point 2 at power approximately two to three months prior to the 2000 refueling outage.

The existing GT1 transformer is used to provide power to the 6.9 kV System from 13.8 kV power System. The source of power for the 13.8 kV System is from Buchanan Substation, as well as, from the output of GT1 on-site or GT2 or 3 at Buchanan Substation. The existing GT1 transformer, which was manufactured more than 50 years ago, is now leaking, and the primary and secondary cables may be deteriorating. To ensure continued reliability of the 13.8 kV power source, a modification has been prepared to replace the existing GT1 transformer with a new transformer, which will also be rated at 20 MVA 13.8 kV/6.9 kV.

The replacement of the existing transformer will require disconnection and replacement of the 6.9 kV secondary cables to the Indian Point 2, 6.9 kV buses through Breakers 52/GT25 and 52/GT26 and to the Indian Point 3, 6.9 kV System through Breaker 52/GT/BT. During the time needed for installation of the new transformer, which will be approximately one month, the 6.9 kV secondary cables to the Indian Point 2, 6.9 kV System will be spliced to cables to the Indian Point 3, 6.9 kV System. This will provide for availability of a 13.8 kV source in accordance with Technical Specification 3.7.A.3 and will maintain compliance with the Station Blackout Rule. The disconnection and replacement of the 6.9 kV secondary cables from the existing GT1 transformer and the installation of the splices will require 10 days prior to installation of the new GT1 transformer. Following installation of the new transformer, the dismantling of the splices, and the connection of the 6.9 kV secondary cables from the Indian Point 2 and 3, 6.9 kV Systems to the new GT1 transformer will require 6 days. For these two intervals, which are separated by approximately

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one month, there will be no 13.8 kV source of power available to supply the Indian Point 2, 6.9 kV System. 13.8 kV power from Buchanan Substation and any available GT will be available to the Unit 1, 440V System, which also supplies the Alternate Safe Shutdown System, when no 13.8 kV source of power is available to supply the Indian Point 2, 6.9 kV System. 138 kV power from Buchanan Substation (the normal offsite power source) will be available through the 138/6.9 kV Station Auxiliary Transformer when no 13.8 kV source of power is available to supply the Indian Point 2, 6.9 kV System. The 13.8 kV source of power will be permanently restored to the original design with the reconnection of the 6.9 kV secondary cables to the Indian Point 2 and 3, 6.9 kV Systems to the new GT1 transformer.

During the two intervals when the 13.8 kV source of power to the Indian Point 2, 6.9 kV System is unavailable, the conditions delineated below will be required. If any components required in items b) through e) become unexpectedly unavailable, a further risk assessment will be performed to determine whether or not to continue the 6.9 kV cable work with the unit at power.

- a) All three emergency diesel generators operable. This is already required by Technical Specification 3.7.B.3 whenever the 13.8 kV source of power is unavailable. If an emergency diesel generator becomes inoperable, the requirements of Technical Specification 3.0.1 will be followed.
- b) All other components required by Technical Specification 3.7.A and 3.7.C.1 and 3.7.C.2 operable.
- c) All four instrument buses operable.
- d) 138 kV Feeders 95331, 95332, 33332 and associated switchgear operable. Correct breaker alignment and indicated power availability verified every shift.
- e) 13.8 kV power from at least one 138/13.8 kV Buchanan transformer supplying the Unit 1, 440 V System operable. Correct breaker alignment and indicated power availability verified every shift.
- f) Work that has the potential to affect operability of the above items will be restricted (this includes surveillances that have turbine or reactor trip risk, switchyard work and operation of cranes near overhead wires). There will be no planned outages or surveillances of the above items.

A risk assessment for the intervals of unavailability of the 13.8 kV source with the unit at power was performed. Core damage frequency was determined to be less than 5.00 E-05, which is still within the lowest risk band category in the Indian Point 2 work planning process. The cumulative risk associated with this activity for the two intervals of unavailability of the 13.8 kV source is less than 1.00 E-06. A qualitative risk evaluation was done for doing the GT1 transformer replacement during the 2000 refueling outage. This evaluation determined that the risk at power compared to the outage was essentially neutral.

A review of forced 138 and 13.8 kV feeder outages shows that since 1981, there has been an average of less than one forced outage per year on each feeder. If the duration of the intervals of unavailability of the 13.8 kV source exceeds the 10-day and 6-day times stated above, a further risk assessment will be performed to determine whether to continue the 6.9 kV cable work with the unit at power. In addition, a supplemental notification will be made in accordance with Technical Specifications.

Should you or your staff have any questions regarding this submittal, please contact Mr. John F. McCann, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. Alan Blair".

cc: Mr. Hubert J. Miller
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