

March 21, 2000

Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

SUBJECT: EVALUATION OF RELIEF REQUESTS NOS. 29, 37, 38, AND 39 FOR THE
REMAINDER OF THE THIRD TEN-YEAR INSERVICE INSPECTION INTERVAL
FOR INDIAN POINT NUCLEAR GENERATING UNIT NO. 2. (TAC NO. MA5918)

Dear Mr. Blind:

By letter dated June 8, 1999, as supplemented by letter dated November 22, 1999, Consolidated Edison Company of New York, Inc. (the licensee) submitted four (4) requests for relief from the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI requirements for inservice inspection. The NRC staff has reviewed and evaluated the information provided in the relief requests (relief request numbers 29, 37, 38, and 39) and concluded that the alternatives discussed in the enclosed safety evaluation will provide an acceptable level of quality and safety. Therefore, the proposed alternatives for relief request numbers 29, 37, 38, and 39 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the third ten-year inservice inspection interval.

This completes the staff's efforts on TAC No. MA5918. If you have any questions, please contact the Project Manager, Jefferey Harold, at (301) 415-1421.

Sincerely,

/RA/

Marsha Gamberoni, Acting Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: Safety Evaluation

cc w/encl: See next page

Mr. A. Alan Blind
 Vice President, Nuclear Power
 Consolidated Edison Company
 of New York, Inc.
 Broadway and Bleakley Avenue
 Buchanan, NY 10511

March 21, 2000

SUBJECT: EVALUATION OF RELIEF REQUESTS NOS. 29, 37, 38, AND 39 FOR THE
 REMAINDER OF THE THIRD TEN-YEAR INSERVICE INSPECTION INTERVAL
 FOR INDIAN POINT NUCLEAR GENERATING UNIT NO. 2. (TAC NO. MA5918)

Dear Mr. Blind:

By letter dated June 8, 1999, as supplemented by letter dated November 22, 1999, Consolidated Edison Company of New York, Inc. (the licensee) submitted four (4) requests for relief from the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI requirements for inservice inspection. The NRC staff has reviewed and evaluated the information provided in the relief requests (relief request numbers 29, 37, 38, and 39) and concluded that the alternatives discussed in the enclosed safety evaluation will provide an acceptable level of quality and safety. Therefore, the proposed alternatives for relief request numbers 29, 37, 38, and 39 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the third ten-year inservice inspection interval.

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REMAINDER OF THE THIRD TEN-YEAR INSERVICE INSPECTION
INTERVAL
RELIEF REQUEST NOS. 29, 37, 38 AND 39
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
DOCKET NUMBER 50-247

1.0 INTRODUCTION

By letter dated June 8, 1999, as supplemented by letter dated November 22, 1999, Consolidated Edison Company of New York, Inc. (the licensee) submitted a request for approval of four (4) alternatives to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI requirements for inservice inspection. Clarifying information was provided via a conference call on November 9, 1999.

2.0 BACKGROUND

Inservice inspection of the ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Code and applicable addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2 and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first ten-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. For Indian Point Unit 2 the applicable edition of Section XI of the ASME Code for the third ten-year inservice inspection (ISI) interval is the 1989 Edition.

3.0 EVALUATION

3.1 Request Number 29

The components for which relief is requested:

Code Class: 1, 2 and 3
References: IWA-5242(a)
Examination Category: B-P, C-H, D-A, D-B and D-C
Description: Insulation removal at mechanical joints of borated systems.

Applicable Code requirement from which relief is requested:

IWA-5242(a) states, "Systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2."

Licensee's Basis for Requesting Relief (as stated):

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative would provide an acceptable level of quality and safety.

Based upon NRC comments regarding Relief Request 29 discussed in NRC letter to Con Edison dated June 3, 1997, we have revised our original request to include the alternatives identified in ASME Code Case N-533 and Code Case N-533-1 (Draft). The ASME Code Committee approved Code Case N-533 on March 14, 1995. A draft change to N-533, Code Case N-533-1 is currently in the approval process. N-533-1 addresses alternative requirements for Class 2 and 3 pressure retaining bolted connections, and the period for performance of the VT-2 examinations.

Licensee's Proposed Alternative Provisions (as stated):

The alternative provisions will be those identified in Code Case N-533-1.

- (a) A system pressure test and VT-2 visual examination shall be performed each refueling outage for Class 1 connections, and each period for Class 2 and 3 connections without removal of insulation.
- (b) The insulation shall be removed from the bolted connections each refueling outage for Class 1 connections and each period for Class 2 and 3 connections and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250.

Licensee's Justification for Granting Relief (as stated):

The leakage/bolting inspection program performed each refueling outage for Class 1 connections and each period for Class 2 and 3 connections will detect damage resulting from boric acid corrosion. The schedule for examinations is consistent with the schedules identified in the Code. This program, combined with operational leakage monitoring of Class 1 systems (1 gpm unidentified / 10 gpm identified) performed in accordance with

Technical Specification 3.1.F, Reactor Coolant System Leakage, provide an acceptable level of quality and safety.

A similar relief request (No. 35), was previously approved for Class 1 components in NRC letter dated July 3, 1996 (TAC No. M91514).

Staff Evaluation

The Code requires the removal of all insulation from pressure-retaining bolted connections in systems borated for the purpose of controlling reactivity when performing VT-2 visual examinations during system pressure tests. For Class 1 systems the Code requires this examination each refueling outage, while Class 2 and 3 systems are required to receive this examination each inspection period. As an alternative to the Code requirements, the licensee has proposed to use Code Case N-533-1, *Alternative Requirements for VT-2 Visual Examination of Class 1, 2 and 3 Insulated Pressure Retaining Bolted Connections, Section XI, Division 1* for borated Class 1, 2 and 3 systems at Indian Point Unit 2. This code case was originally written for Class 1 systems (Code Case N-533). The licensee has been authorized to implement an alternative examination similar to Code Case N-533 for Class 1 bolted connections in a safety evaluation dated July 3, 1996. The safety evaluation allows the licensees to perform the VT-2 visual examination with the insulation in place during a system pressure test following a minimum 4-hour hold time, and requires the insulation be removed for direct visual examination for any evidence of leakage each outage for Class 1 bolted connections. Under the licensee's proposal for Class 2 and 3 systems, the code case rules would be the same except that the inspection frequency would be the Code required frequency of every inspection period as stated in Code Case N-533-1.

The staff finds for Class 1, 2 and 3 systems, the alternative in Code Case 533-1 provides an acceptable approach to ensuring the leak-tight integrity of systems borated for the purpose of controlling reactivity. The approach includes a system pressure test and VT-2 visual examination will be performed each outage for Class 1 systems and each period for Class 2 and 3 systems. For the staff to find the use of this code case acceptable, the system pressure test will utilize a minimum 4-hour hold time. The 4-hour hold time will allow any leakage to penetrate the insulation, thus providing a means of detecting any significant leakage with the insulation in place. By removing the insulation each outage for Class 1 systems and each inspection period for Class 2 and 3 systems, the licensee will be able to detect minor leakage indicated by the presence of boric acid crystals or residue. The staff finds this two step approach will provide an acceptable level of quality and safety for bolted connections in borated systems.

Staff Conclusion

The staff concludes that the use of Code Case N-533-1 for use on Class 1, 2 and 3 systems following a system pressure test with a minimum 4-hour hold time is authorized pursuant to 10 CFR 50.55a(a)(3)(i). The alternative is authorized for the remainder of the third interval at Indian Point Unit 2 or until such time Code Case N-533-1 is published in a future revision of Regulatory Guide (RG) 1.147. At that time, if the licensee intends to continue to implement Code Case N-533-1, the licensee should follow all the provisions in Code Case N-533-1 with the limitations issued in RG 1.147, if any.

3.2 Request Number 37

The components for which relief is requested:

Components: Non-Code piping, pumps, and valves that are part of the containment system, or which penetrate or are attached to the containment vessel

References: IWE - 1220(d)

Subsections: IWB and IWC

Applicable Code requirement from which relief is requested (as stated):

Per IWE-1220(d) piping, pumps, and valves that are part of the containment system, or which penetrate, or are attached to the containment vessel shall be examined in accordance with the rules of IWB or IWC, as appropriate to the classification defined by their design specifications.

Licensee's Basis for Requesting Relief (as stated):

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative would provide acceptable level of quality and safety.

When the Federal Register published the rules for inservice inspection of containment, ASME B&PV Code, Section XI, 1992 edition with 1992 addenda and specifically IWE, became applicable for inservice inspection of containment. At a minimum, the Code requires all containment penetrations to be Class 2, and that the piping should be examined to the requirements of Subsections IWB or IWC. The Code does not address pre-existing Code requirements. Relief is sought in order to reconcile the differences regarding Quality Groups within the editions of the Code.

The initial Inservice Inspection Program designated plant components and piping, including containment penetrations, as Quality Group A, B, C and None in accordance with NRC Regulatory Guide 1.26, Rev. 3. Quality Group A, B and C piping systems are examined and tested to the requirements of Section XI 1989 edition, as published in the Federal Register. Containment penetrations were classified based on the designation of the associated system. The NRC approved the Inservice Inspection Program for the Third Interval in a letter to Con Edison dated June 3, 1997. This program, per 10 CFR 50.55(a) is written to the ASME Section XI, 1989 edition with no addenda. Non-code piping was subjected to pressure testing per 10 CFR 50, Appendix J.

The 1992 edition of the ASME Code with 1992 addenda requires that all piping penetrating or attached to the containment vessel be examined in accordance with the rules of IWB or IWC. The rules for Class 2 in the 1992 edition, 1992 addenda, of Section XI have not been approved for inspection of piping and components at Indian Point. These Codes may only become applicable one year prior to the end of our current interval, provided they have been published in the Federal Register.

Rather than maintain two programs for the inspection of piping and related components, the requirements of ASME Section XI, 1989 edition will be used for the inservice inspection of Quality Group A, B & C and the previously non-Code components.

The inservice inspection of the containment, including repair and replacement will be to the requirements of the ASME Section XI, 1992, edition, including 1992 addenda.

Licensee's Proposed Alternative Provisions (as stated):

Inservice inspection, including Code repair and replacement of previously non-Code piping, pumps and valves that are part of the containment system, or which penetrate or are attached to the containment vessel, are newly designated Class 2. This designation is in accordance with the rules of the 1992 Code, with 1992 addenda. These new Class 2 components are identified as Quality Group E* and will be inspected and maintained to the rules of ASME Section XI, 1989 edition and the inservice inspection program as required for Class 1, 2 & 3 components.

*Quality Group "E" is a designation identifying the previously non-code piping, at containment penetrations, that are now included in the inservice inspection program, as Class 2. This designation allows for the separation of Code requirements. The boundary is from the first weld inside of containment to the outermost containment isolation valve, as identified in the IP-2 UFSAR. Quality Group C closed systems will be designated Quality Group E from the first weld inside containment to the first weld outside containment. This is to specifically address the Component Cooling Water System, which, if left upgraded, would be exempt from NDE, based upon the operating pressure and temperature of the system. Currently the Component Cooling Water System is designated Quality Group C and is subject to examination of integrally welded pipe attachments and pressure testing.

Licensee's Justification for Granting Relief (as stated):

Inservice inspections of Quality Group E, previously non-code piping and components that penetrate or are attached to containment, to the same Code edition as required for examination of Class 1, 2 & 3 components, will provide an acceptable level of safety and quality.

The new requirements for the inspection of containment address the examination of Class 1 and 2 piping, components and their supports to the requirements of the 1992 edition, 1992 addenda, of the Code. These requirements have not been approved for the inspection of Class 1 and 2 piping, components and their supports. The current inservice inspection program for Quality Group A, B and C components are required to be performed in accordance to the rules of ASME Section XI, 1989 edition, no addenda. The current inservice inspection program at IP-2 has been previously reviewed and approved by the NRC.

Staff Evaluation

The published rules for inservice inspection of containment are the ASME Code, Section XI, 1992 edition with 1992 addenda. The 1992 edition of the ASME Code with 1992 addenda requires that all piping penetrating or attached to the containment vessel be examined in accordance with the rules of IWB or IWC, as appropriate to the classification defined by the design specification. The current inservice inspection program for ASME Code Class 1, 2, and 3 components at IP-2 are required to be performed in accordance to the rules of ASME Section XI, 1989 edition. The licensee updated its third ten-year interval program to the 1989 edition of Section XI in accordance with the requirements of 10 CFR 50.55a. The staff has previously found the inspection rules of the 1989 Edition of Section XI to be acceptable for similar components in similar service conditions. Therefore, the staff finds the licensee's proposal of performing inservice inspections of the previously non-code piping and components that penetrate or are attached to containment using the same Code edition as required for examination of Class 1, 2, & 3 components will provide an acceptable level of safety and quality.

Staff Conclusion

The licensee's proposed alternative to follow the requirements of ASME Code, Section XI, 1989 edition for the newly designated class 2 piping for the remainder of the licensee's third ten year inservice inspection interval is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

3.3 REQUEST NUMBER 38

The components for which relief is requested:

Component:	Reactor Coolant Pumps
Code Class:	Quality Group A
References:	IWB-2500 Table 1
Examination Category:	B-K-1
Item Number:	B 10.20
Description:	Integrally Welded Attachments
ASME Code Case:	N-509

Applicable Code requirement from which relief is requested:

Table IWB-2500-1, Examination Category B-K-1, Item B 10.20, Note 2 requires "... essentially 100% coverage of the attachment weld..." (or "greater than 90% as clarified in NRC Information Notice 98-42).

Licensee's Basis for Requesting Relief (as stated):

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the purposed alternative would provide an acceptable level of quality and safety.

The access to the integrally welded attachments on the reactor coolant pumps is limited to approximately 81% of the required area. This is due to the proximity of the pump

supports to the lugs preventing access for adequate surface preparation. There are three lugs supporting each reactor coolant pump and loop piping.

There are a total of twelve (12) lugs for the four (4) reactor coolant pumps. Per Code Case N-509, a total of 10% or 1 (rounded-off) lug requires examination.

Implementation of Code Case N-509 was discussed in the NRC's Request for Additional Information dated October 13, 1994 and Con Edison's response dated November 16, 1994. Con Edison indicated that it intended to incorporate N-509 in its ISI Program and requested authorization to do so. The NRC in its response (TAC No. M88559) did not specifically address the incorporation of Code Case N-509; however, the reviewer [INEL-95/0125] indicated that the use of the code case would be "acceptable provided [Con Edison] schedules a minimum of 10% of the integrally welded attachments in Class 1, 2 and 3 systems."

Licensee's Proposed Alternative Provisions (as stated):

Con Edison will continue to inspect those available portions (approximately 81%) of the three welded attachments on one of four pumps that are accessible using the liquid penetrant method. Con Edison will perform a VT-1 visual examination on 100% of the integrally welded attachments on the selected pump.

Licensee's Justification for Granting Relief (as stated):

The performance of two additional weld examinations combined with a 100% visual examination VT-1 provides continued assurance that the integrity of the integrally welded attachments are maintained.

Staff Evaluation

The applicable code requirements for the remainder of the licensee's third ten year inservice inspection interval, Table IWB-2500-1, Examination Category B-K-1, Item B 10.20, Note 2 requires "... essentially 100% coverage of the attachment weld..." (or "greater than 90% as clarified in NRC Information Notice 98-42). The licensee proposes to follow the provisions of Code Case N-509. The staff has found Code Case N-509 to be acceptable in RG 1.147, Rev. 12, subject to the following condition which the licensee included as part of their proposed alternative examination:

A minimum 10% sample of integrally welded attachments for each item in each code class per interval should be examined.

The licensee stated that access to the integrally welded attachments on the reactor coolant pumps is limited to approximately 81% of the required area. This is due to the proximity of the pump supports to the lugs preventing access for adequate surface preparation. There are three lugs supporting each reactor coolant pump and loop piping. The licensee has a total of twelve (12) lugs for the four (4) reactor coolant pumps. Per Code Case N-509, a total of 10% or 1 (rounded-off) lug requires examination.

The licensee proposes to continue to inspect those available portions (approximately 81%) of the three welded attachments on one of four pumps that are accessible using the liquid penetrant method. In addition, the licensee states they will perform a VT-1 visual examination on 100% of the integrally welded attachments on the selected pump.

The staff finds the performance of two additional weld examinations combined with a 100% visual examination VT-1 provides continued assurance that the integrity of the integrally welded attachments are maintained and exceeds the condition specified for acceptance of Code Case 509 in RG 1.147, Rev. 12.

Staff Conclusion

Since the licensee's proposed examinations satisfy RG 1.147, Rev. 12, the staff finds the licensee's alternative acceptable.

3.4 Request Number 39

The components for which relief is requested:

Code Class:	Quality Group B (identified as Quality Group E for piping upgraded as a result of incorporating the containment code rules)
References:	Table IWB-2500-1
Examination Category:	C-F-2
Item Number:	C5.50 & C5.60
Description:	Pressure Retaining Welds
System:	Service Water

Applicable Code requirement from which relief is requested:

The Code requires the performance of surface and volumetric examination of pipe welds.

Licensee's Basis for Requesting Relief (as stated):

Piping in the service water system was originally identified as Quality Group D and received the examinations as required by Section XI. In our response to NRC Generic Letter 89-13, Con Edison committed to performance of a program that includ[ed] radiography. This was identified in Con Edison Letter to the NRC dated February 2, 1990.

The portion of piping from the first weld inside containment to the second containment isolation valve has now been re-designated Quality Group E (Class 2) due to the incorporation of the rules for IWE & IWL in the Federal Register. This classification requires the performance of surface and volumetric examination. The piping in the service water system is fabricated using partial penetration welds, square butt preparation with concrete lining, per Con Edison Specification 9321-248-35. This weld configuration does not support volumetric examination as required by the Code.

A radiographic technique for the measurement of wall thinning was developed. This technique identifies corrosion problems, unique to this system, and is used to monitor the condition of the system. The 10" service water piping has been examined 100% using

this technique. Based on tracking and trending of the conditions identified they are corrected, as required.

Licensee's Proposed Alternative Provisions (as stated):

The surface examination will be performed as required by Code.

Based on the tracking and trending of previously identified conditions, recommendations will be made on the number and locations of welds to be examined. These will be examined using the radiographic technique for wall thinning.

Licensee's Justification for Granting Relief (as stated):

The Service Water System has been the focus of examinations beyond that required by Section XI, as identified in our response to Generic Letter 89-13. The Class 2 (Quality Group E) portion represents a small portion (less than 5%) of the system. It will benefit from the examination and evaluation of the overall Service Water System.

Staff Evaluation

The applicable rules for inservice inspection of containment at IP-2 are the ASME Code, Section XI, 1992 edition with 1992 addenda. The 1992 edition of the ASME Code with 1992 addenda requires that all piping penetrating or attached to the containment vessel be examined in accordance with the rules of IWB or IWC, as appropriate to the classification defined by the design specification. Following the applicable rules of Section XI, 1989 edition, the licensee would be required to perform surface and volumetric examinations of the service water system in the region that penetrates or is attached to the containment. The piping in the service water system is fabricated using partial penetration welds (square butt preparation with a concrete lining). This configuration does not support ultrasonic examination as required by the Code. The licensee proposes in lieu of volumetric examination to utilize a program developed in response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment." The program uses a radiographic technique that was developed for the measurement of wall thinning in the service water system. This technique identifies corrosion problems, unique to this system, and is used to monitor the condition of the entire service water system. The 10" service water piping has been examined 100% using this technique. The licensee has been monitoring the entire system using the radiographic technique for the past 20 years. The licensee's proposed alternative is specifically tailored to address the degradation mechanism known to affect the service water system and is believed to be a more appropriate and effective technique as compared to that required by the Code.

Staff Conclusion

Therefore, the staff concludes that the licensee's proposed alternative provides an acceptable level of quality and safety at Indian Point Unit 2 and is authorized for the remainder of the licensee's third ten-year inservice inspection interval pursuant to 10 CFR 50.55a(a)(3)(i).

4.0 SUMMARY

The staff has reviewed the licensee's relief requests and determined that the licensee's alternatives will provide an acceptable level of quality and safety. Therefore, the proposed alternatives for relief request numbers 29, 37, 38, and 39 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the third ten-year inservice inspection interval.

Principal Contributor: A. Keim

Date: March 21, 2000

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