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March 17, 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: Proposed Technical Specification Amendment Consisting of
Administrative Changes to Steam Generator Inspection Requirements

Transmitted herewith is an "Application for Amendment to the Operating License," sworn on March 17, 2000. This application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit No. 2 Technical Specifications. In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

Attachment I to this letter provides the proposed changes to Specification 4.13.A.3.f, Attachment II provides the proposed changes as markups on the existing Technical Specification page, and Attachment III provides the Safety Assessment. It has been determined that the changes set forth herein do not represent a significant hazards consideration as defined by 10 CFR 50.92(c).

A001

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,



Attachments

cc: Mr. Hubert J. Miller
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSOLIDATED EDISON COMPANY) Docket No. 50-247
OF NEW YORK, INC.)
(Indian Point Station, Unit No. 2))

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A of this license.

This Application for amendment to the Indian Point 2 Technical Specifications seeks to propose changes to Specification 4.13.A.3.f.

The specific proposed Technical Specification Revisions are set forth in Attachment I to this Application. A mark-up of the existing Technical Specification is provided in Attachment II. A Safety Assessment of the proposed change is set forth in Attachment III to this Application. These assessments demonstrate that the proposed changes do not represent a significant hazards consideration as defined in 10 CFR 50.92(c).

As required by 10 CFR 50.91(b)(1), a copy of this Application and our analysis concluding that the proposed changes do not constitute a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY: A. Alan Blind
A. Alan Blind
Vice President - Nuclear Power

Subscribed and sworn to
before me this 17th day
March, 2000.

Elizabeth A. Melanson
Notary Public

ELIZABETH A. MELANSON
Notary Public, State of New York
No. 01ME4876094
Qualified in Orange County
Commission Expires Feb. 9, 2001

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
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MARCH 2000

- c. Unscheduled steam generator examinations shall be required in the event there is a primary to secondary leak exceeding technical specifications, a seismic occurrence greater than an operating basis earthquake, a loss-of-coolant accident requiring actuation of engineered safeguards, or a major steamline or feedwater line break.
- d. Unscheduled examinations may include only the steam generator(s) affected by the leak or other occurrence.
- e. In case of an unscheduled steam generator examination, the profilometry tensile strain criterion shall be the same as contained in the approved program for the last scheduled steam generator inspection.

3. Basic Sample Selection and Examination

- a. At least 12% of the tubes in each steam generator to be examined shall be subjected to a hot-leg examination.
- b. At least 25% of the tubes inspected in Specification 4.13.A.3.a above shall be subjected to a cold-leg examination.
- c. At least 20% of a random sample of tubes containing sleeves shall be subjected to an examination throughout the sleeved portion of the tube.
- d. Tubes selected for examination shall include, but not be limited to, tubes in areas of the tube bundle in which degradation has been reported, either at Indian Point 2 in prior examinations, or at other utilities with similar steam generators.
- e. Examination for deformation ("dents") shall be either by eddy current or by profilometry.
- f. Examination for degradation other than deformation shall be by eddy current techniques. A 700-mil diameter probe shall be used unless previous data indicates that a 700-mil diameter probe would not pass through the tube. If the 700-mil diameter probe cannot pass through the tube, the largest size probe that is expected to pass through the tube shall be used. In all cases a probe with at least a 610-mil diameter shall be used, except for the examination of the U-bends and the cold-legs of tubes in rows 2 through 5. For these examinations, a 540-mil diameter probe may be used, provided it is justified by profilometry measurement within the tensile strain criterion.

ATTACHMENT II

PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGE

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
MARCH 2000

On this marked-up page from the current Tech Specs:

Additions are shown by ***bold italic***,

and

Deletions are shown by ~~double-strikethrough~~.

- c. Unscheduled steam generator examinations shall be required in the event there is a primary to secondary leak exceeding technical specifications, a seismic occurrence greater than an operating basis earthquake, a loss-of-coolant accident requiring actuation of engineered safeguards, or a major steamline or feedwater line break.
- d. Unscheduled examinations may include only the steam generator(s) affected by the leak or other occurrence.
- e. In case of an unscheduled steam generator examination, the profilometry tensile strain criterion shall be the same as contained in the approved program for the last scheduled steam generator inspection.

3. Basic Sample Selection and Examination

- a. At least 12% of the tubes in each steam generator to be examined shall be subjected to a hot-leg examination.
- b. At least 25% of the tubes inspected in Specification 4.13.A.3.a above shall be subjected to a cold-leg examination.
- c. At least 20% of a random sample of tubes containing sleeves shall be subjected to an examination throughout the sleeved portion of the tube.
- d. Tubes selected for examination shall include, but not be limited to, tubes in areas of the tube bundle in which degradation has been reported, either at Indian Point 2 in prior examinations, or at other utilities with similar steam generators.
- e. Examination for deformation ("dents") shall be either by eddy current or by profilometry.
- f. Examination for degradation other than deformation shall be by eddy current techniques. ~~using a 700-mil diameter probe.~~ **A 700-mil diameter probe shall be used unless previous data indicates that a 700-mil diameter probe would not pass through the tube.** If the 700-mil diameter probe cannot pass through the tube, **the largest size probe that is expected to pass through the tube shall be used. In all cases a probe with at least a 610-mil diameter probe shall be used.** ~~For used, except for the~~ examination of the U-bends and ~~the~~ cold-legs of tubes in rows 2 through 5, ~~a~~ **5. For these examinations, a 540-mil diameter probe may be used, provided it is justified by profilometry measurement within the tensile strain criterion.**

ATTACHMENT III

SAFETY ASSESSMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
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SECTION I - Description of Changes

In Section 4.13.A.3.f, the administrative changes involve updating Section 4.13.A.3.f to permit more flexibility in the probes used in steam generator tube inspection and to reflect current technological advances in inspection equipment, while still maintaining the 610-mil diameter probe restriction.

Section 4.13.A.3.f, now reads:

Examination for degradation other than deformation shall be by eddy current techniques. A 700-mil diameter probe shall be used unless previous data indicates that a 700-mil diameter probe would not pass through the tube. If the 700-mil diameter probe cannot pass through the tube, the largest size probe that is expected to pass through the tube shall be used. In all cases a probe with at least a 610-mil diameter shall be used, except for the examination of the U-bends and the cold-legs of tubes in rows 2 through 5. For these examinations, a 540-mil diameter probe may be used, provided it is justified by profilometry measurement within the tensile strain criterion.

SECTION II - Evaluation of Changes

The 700-mil/610-mil diameter probe requirement for steam generator tube inspection was incorporated in Amendment 81 (dated October 21, 1982). During that period of time, the steam generator channel head robotics for inspections were not advanced as today's models and the options for probes was limited to 700-mil, 610-mil and 540-mil diameter sizes. Immediate gauging of the tube support plate intersections for restrictions was beneficial to determine if a tube required plugging early in the program to aid the ALARA and the "production" aspects of the tube inspection. As time evolved, the robotics also evolved to reduce radiation exposure for the steam generator workers. With development and refinement of robotics, intermediate probe sizes were used to the maximum extent possible to allow the largest probe possible to inspect as much of the tube as possible. The larger the probe, the better the "fill factor" and better eddy current data from the probe.

With today's advancements, testing of the tubes with a 610-mil diameter probe is not necessary if data can be collected with a larger sized probe. Finally, to still require using a 610-mil diameter probe after a larger diameter probe has supplied sufficient information is counter-productive to ALARA concerns and increases the inspection time with no additional benefit.

SECTION III - No Significant Hazards Evaluation

The proposed changes do not involve a significant hazards consideration because:

- 1) Does the proposed license amendment involve a significant increase in the probability or in the consequences of an accident previously evaluated?

No. The proposed changes facilitate the application of current diagnostic techniques. The changes involve updating Section 4.13.A.3.f, to permit more flexibility in the eddy current probes used in steam generator tube inspection and to reflect current technological advances in inspection equipment, while still maintaining the 610-mil diameter probe restriction. These changes do not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety System Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed changes would not involve a significant increase in the probability or in the consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed changes facilitate the application of current diagnostic techniques. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently no new failure modes are introduced as a result of the proposed change. Therefore, the proposed changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

No. The proposed changes facilitate the application of current diagnostic techniques. Since there are no changes to the operation of the facility or the physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

SECTION IV - Impact Of Changes

These changes will not adversely impact the following:

- ALARA Program
- Security and Fire Protection Programs
- Emergency Plan
- UFSAR or SER Conclusions
- Overall Plant Operations and the Environment

The proposed changes are administrative in nature. The changes involve updating Section 4.13.A.3.f, to permit more flexibility in the eddy current probes used in steam generator tube inspection and to reflect current technological advances in inspection equipment, while still maintaining the 610-mil diameter probe restriction. This level of detail is not listed or implied in the UFSAR. Therefore, there is no UFSAR impact. There are no new failure modes introduced by this change. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected.

SECTION V - Conclusion

Therefore, the proposed changes to the Technical Specifications do not involve a significant hazards consideration. In addition, the proposed change to the Technical Specifications has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.