

June 28, 2000

MEMORANDUM TO: Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

FROM: Brian W. Sheron, Associate Director */RA by John A. Zwolinski Acting
For/*
for Project Licensing and Technical Analysis
Office of Nuclear Reactor Regulation

SUBJECT: LICENSE AMENDMENT FOR INDIAN POINT 2

The following is background on the license amendment for Indian Point 2, which affects the control room air filtration system and the containment air filtration and cooling system, among other items:

The amendment consists of changes to the TSs which result from implementation of an alternate radiological source term as permitted by 10 CFR 50.67 and implements plant modifications to the containment air handling systems and the control room air handling systems related to the use of the alternate source term. This amendment is the product of a pilot proposed by Consolidated Edison. The NRC solicited pilot projects such as this to obtain insights in support of the rulemaking for the implementation of alternative source terms (64 FR 71990) and the supporting regulatory guidance. Indian Point 2 is the pilot plant for reanalysis of radiological dose consequences using the Alternate Source Term. Indian Point 2 made an initial submittal of their reanalysis in 1996, but this was modified after the staff discussed several areas that needed refinement. They again submitted a radiological analysis of the FSAR design basis accidents, along with Technical Specification changes, on November 18, 1999. In response to staff questions, additional information was submitted by letters dated February 14, March 21, April 6, April 13, and May 11, 2000.

The following describes the impact of the Indian Point 2 license amendment on the Technical Specification (TS) requirements which must be met before heating the reactor coolant system above 200 degrees F:

1. TS 3.3.H says "The control room air filtration system shall be operable at all times when containment integrity is required."

By TS 3.6.A, containment integrity is required whenever the reactor is above cold shutdown. Cold shutdown is defined in TS as Tavg less than or equal to 200 degrees F. Therefore, the control room air filtration system must be operable above 200 degrees F.
2. The licensee has modified the control room air filtration system to initiate pressurization mode for a safety injection signal or a control room high radiation signal, and has changed the air flow rate through the filters.

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TS 4.5.E.2 is a surveillance requirement which requires certain air flow rates for the control room air filtration system in order to pass the surveillance. These flow rates are changed in the license amendment.

TS 4.5.E.4 requires the control room air filtration system to switch into recirculation mode of operation for a safety injection signal or a control room high radiation signal. In the license amendment, this is changed to the pressurization mode.

Since the present surveillance requirements cannot be met, the control room air filtration system is inoperable and the licensee cannot heat the plant above 200 degrees F.

cc: R. Zimmerman
J. Johnson
J. Silber

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Accession No. ML003727554

OFFICE	PD1-2		PD1-2		PD1		DD:DLPM		D:DLPM	
NAME	JBoska		JClifford		EAdensam		SBlack		JZwolinski	
DATE	06/28/00		06/28/00		6/28/00		6/28/00		06/28/00	

OFFICE	ADPT									
NAME	Bsheron/JAZ for									
DATE	06/28/00		07/ /00		07/ /00		07/ /00		06/ /00	