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August 22, 2000

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-00-108

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

Subject: Proposed Amendment to the Technical Specifications for Cycle 15 to Allow  
Extended RPI Deviation Limits and On-Line Calibration of the RPI Channels

Reference: Con Edison Letter NL-00-073, subject: "Proposed Amendment to the Technical  
Specifications for Cycle 15 to Allow Extended RPI Deviation Limits and On-Line  
Calibration of the RPI Channels," dated June 29, 2000.

Transmitted herewith is an "Application for Amendment to the Operating License," sworn to on  
August 22, 2000. This application requests an amendment to the Consolidated Edison Company  
of New York, Inc. (Con Edison), Indian Point Unit No. 2 Technical Specifications. This  
submittal replaces in its entirety the Con Edison referenced submittal of June 29, 2000.

This submittal seeks approval of changes to the Technical Specifications necessary to allow  
extended Rod Position Indication (RPI) deviation limits and on-line calibration of the RPI  
channels for Cycle 15. The current Technical Specifications are for Cycle 14 only. Specifically,  
Con Edison proposes that Section 3.10.6 be changed to allow extended RPI deviation limits for  
Cycle 15 and Section 3.10.4 be changed to allow on-line calibration of the RPIs for Cycle 15.  
Attachment I to this letter provides the proposed changed pages, Attachment II provides the  
proposed changes as markups on the existing Technical Specification pages, and Attachment III  
provides the Safety Assessment.

The Cycle 15 calculated reactor physics parameters are provided in Attachments IV (Proprietary)  
and VI (Non-Proprietary). Selected comparisons of the Cycle 14 calculated core power  
distributions versus Cycle 14 flux maps are provided in Attachment V (Proprietary) and VII  
(Non-Proprietary).

AP01

Change: NRC PDR 1tr encl  
1 w/o prop.

Attachments IV and V contain proprietary information that is supported by an affidavit which sets forth the basis on which the information may be withheld from public disclosure by the Commission, and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, it is requested that the information to which Con Edison asserts proprietary claims be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the patented or proprietary aspects of the items listed above or the supporting Con Edison affidavit should reference NET-085-03 and should be addressed to the undersigned. The proprietary affidavit is provided in Enclosure 1. Attachments VI and VII are the non-proprietary versions.

If this change is approved it will result in significant operational benefits and enhanced unit availability. Therefore, Con Edison requests the completion of the NRC review prior to the startup of the next fuel cycle, Cycle 15, currently scheduled for November, 2000.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC). Both committees concur that the proposed changes do not represent a significant hazards consideration as defined by 10 CFR 50.92(c).

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.

Con Edison will submit a proposed amendment to the Technical Specifications by July 31, 2001, which will justify the removal of the cycle specific constraint for extended RPI deviation limits and on-line calibration of the RPI channels.

Commitments made by Con Edison contained in this correspondence are listed in Enclosure 2.

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

Sincerely,

A handwritten signature in black ink, appearing to read "J. F. McCann", written in a cursive style.

Enclosure and Attachments

cc: next page

cc: Mr. Hubert J. Miller  
Regional Administrator-Region I  
US Nuclear Regulatory Commission  
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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 THE OPERATING LICENSE

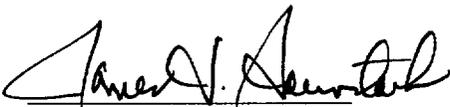
Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A of this license.

This Application for amendment to the Indian Point 2 Technical Specifications seeks to propose administrative changes to the following:

- 1) Section 3.10.6, to allow extended RPI deviation limits during Cycle 15, and
- 2) Section 3.10.4, to allow on-line calibration of the RPIs during Cycle 15.

The specific proposed Technical Specification Revisions are set forth in Attachment I to this Application. A mark-up of the existing Technical Specifications is provided in Attachment II. Safety Assessments of the proposed changes are 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). The Cycle 15 calculated reactor physics parameters are provided in Attachments IV (Proprietary) and VI (Non-Proprietary). Selected comparisons of the Cycle 14 calculated core power distributions versus Cycle 14 flux maps are provided in Attachment V (Proprietary) and VII (Non-Proprietary).

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:   
James S. Baumstark  
Vice President - Nuclear Engineering

Subscribed and sworn to  
before me this 22<sup>nd</sup> day  
August 2000.

  
Notary Public

**KAREN L. LANCASTER**  
Notary Public, State of New York  
No. 60-4643659  
Qualified in Westchester County  
Term Expires 9/30/01

ENCLOSURE I

PROPRIETARY AFFIDAVIT

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