James S. Baumstark
Vice President
Nuclear Engineering

Consolidated Edison Company of New York, Inc.
Indian Point 2 Station
Broadway & Bleakley Avenue
Buchanan, New York 10511

Internet: baumstarkj@coned.com
Telephone: (914) 734-5354
Cellular: (914) 391-9005
Pager: (917) 457-9698
Fax: (914) 734-5718

September 18, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247
NL 00-119

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop P1-137
Washington, D.C. 20555-0001

SUBJECT: Supplement to License Amendment Request Regarding Reactor Protection System and Engineered Safety Features Actuation System Relaxed Test Times

References:

1. Con Edison to NRC letter dated May 5, 1999, "Proposed Amendment to Licensing Basis to Implement Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) Relaxed Test Times and Completion Times in Accordance with WCAP-14333-P-A, Revision 1"

2. Con Edison to NRC letter dated December 22, 1999, "Supplementary Information in Support of Proposed Technical Specification Amendment to Licensing Basis to Implement Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) Relaxed Test Times and Completion Times in Accordance with WCAP-14333-P-A, Revision 1"

By Reference 1, and as supplemented by Reference 2, Consolidated Edison Company of New York, Inc., (Con Edison) requested an amendment to the Indian Point Unit 2 Technical Specifications to permit relaxation of test times and allowed outage times for reactor protection and engineered safety features actuation instrumentation. As a result of conversations with the NRC staff regarding this license amendment request, the attachment to this letter provides a revision to proposed Note "#" of Technical Specification Table 3.5-2, "Reactor Trip Instrumentation Limiting Operating

A001

Conditions." This change provides clarification regarding the bypassing of a reactor trip breaker and associated logic channel for corrective maintenance. An associated change to the TS Bases for Section 4.5, "Engineered Safety Features," is also included in the attachment.

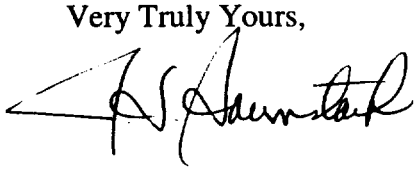
The attachment does not include Technical Specification revision pages for issuance, since another license amendment request is pending that also revises some of the same pages affected by this license amendment request. Clean revised pages will be provided prior to issuance of the affected license amendments.

The original amendment request was evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and was determined to not involve any significant hazards consideration. The attached proposed changes do not impact that determination and the conclusions are still valid.

In accordance with 10 CFR 50.91, a copy of this submittal and the associated attachment is being submitted to the designated New York State official.

There are no commitments contained in this submittal. Should you or your staff have any questions regarding this submittal, please contact Mr. John F. McCann, Manager, Nuclear Safety and Licensing at (914) 734-5074.

Very Truly Yours,



Subscribed and sworn to
before me this 18th day
of September 2000.

Karen L. Lancaster
Notary Public

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

Attachment

cc:

Regional Administrator
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Patrick D. Milano, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop O-8-2C
Washington, DC 20555

NRC Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

Mayor, Village of Buchanan
236 Tate Avenue
Buchanan, NY 10511

Mr. Paul Eddy
NYS Department of Public Service
3 Empire Plaza
Albany, NY 12223

Mr. William F. Valentino, President
NYS ERDA
Corporate Plaza West
286 Washington Ave. Extension
Albany, NY 12223-6399

Mr. Jack P. Spath, Program Director
NYS ERDA
Corporate Plaza West
286 Washington Ave. Extension
Albany, NY 12223-6399

ATTACHMENT TO NL 00-119

REPLACEMENT MARKED UP TECHNICAL SPECIFICATION PAGES

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

Table 3.5-2

Reactor Trip Instrumentation Limiting Operating Conditions

F.P. = $\frac{\text{Rated Power}}{\text{Rated Power}}$

* If two of four power range channels are greater than 10% F.P., channels are not required.

** If one of two intermediate range channels is greater than 10^{-10} amps, channels are not required.

*** 2/4 trips all four reactor coolant pumps.

**** Required only when control rods are positioned in core locations containing LOPAR fuel.

\# A reactor trip breaker and/or associated logic channel may be bypassed for maintenance or surveillance testing for up to eight hours provided the redundant reactor trip breaker and/or associated logic channel is operable.

An Engineered Safety Feature (SI) logic channel may be bypassed for maintenance or surveillance testing for up to eight hours provided the redundant logic channel is operable.

Add new paragraph:

A reactor trip breaker and associated logic channel may be bypassed for corrective maintenance for up to 24 hours if corrective maintenance is required on the logic channel, provided the redundant reactor trip breaker and/or associated logic channel is operable.

Basis

The Safety Injection System and the Containment Spray System are principal plant safeguards that are normally inoperative during reactor operation. Complete systems tests cannot be performed when the reactor is operating because a safety injection signal causes reactor trip, main feedwater isolation and containment isolation, and a Containment Spray System test requires the system to be temporarily disabled. The method of assuring operability of these systems is, therefore, to combine systems tests to be performed during plant refueling shutdowns, with more frequent component tests, which can be performed during reactor operation.

The refueling systems tests demonstrate proper automatic operation of the Safety Injection and Containment Spray Systems. With the pumps blocked from starting, a test signal is applied to initiate automatic action and verification made that the components receive the safety injection signal in the proper sequence. The test demonstrates the operation of the valves, pump circuit breakers, and automatic circuitry[1].

During reactor operation, the instrumentation which is depended on to initiate safety injection and containment spray is generally checked daily and the initiating circuits are tested monthly (in accordance with Specification 4.1). The testing of the analog channel input is accomplished in the same manner as for the reactor protection system. The engineered safety features logic system is tested by means of test switches to simulate inputs from the analog channels. Test switches are also provided down stream of the master relay output contacts. The purpose of these test switches is to prevent actuation of engineered safety features equipment during testing. Verification that the logic is accomplished is indicated by the matrix test light and/or master relay operation.

Other systems that are also important to the emergency cooling function are the accumulators, the Component Cooling System, the Service Water System and the containment fan coolers. The accumulators are a passive safeguard. In accordance with Specification 4.1, the water volume and pressure in the accumulators are checked periodically. The other systems mentioned operate when the reactor is in operation and, by these means, are continuously monitored for satisfactory performance.

For the four flow distribution valves (856 A, C, D and E), verification of the valve mechanical stop adjustments is performed periodically to provide assurance that the high head safety injection flow distribution is in accordance with flow values assumed in the core cooling analysis.

Add new sentences:
Corrective (and not preventive) maintenance is permitted on a logic channel provided that the redundant channel is operable. For the RPS, 24 hours of such maintenance is permitted for the logic channel. This same 24 hour corrective maintenance period is permitted for the trip breaker if the logic channel requires maintenance at the same time.