

June 28, 1977

Docket No. 50-247

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Consolidated Edison Company
 of New York, Inc.
 ATTN: Mr. William J. Cahill, Jr.
 Vice President
 4 Irving Place
 New York, New York 10003

Gentlemen:

The Commission has issued the enclosed Amendment No. 31 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2. The amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated December 9, 1976.

The amendment to the Technical Specifications establishes provisions for steam generator tube inspection that are consistent with the guidance contained in Regulatory Guide 1.83, Revision 1, dated July 1975.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Robert W. Reid, Chief
 Operating Reactors Branch #4
 Division of Operating Reactors

Enclosures:

1. Amendment No. 31
2. Safety Evaluation
3. Notice

cc w/enclosures:
 See next page

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Applied Permit


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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 31
License No. DPR-26

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) sworn to December 3, 1976, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C.; There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

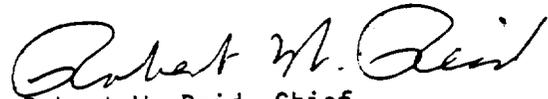
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-26 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 31, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 28, 1977

ATTACHMENT TO LICENSE AMENDMENT NO. 31

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
ii - iv	ii - iv
-	4.13-1 - 4.13-5
-	Table 4.13-1

The new pages and changed areas on the revised pages are shown by marginal lines.

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4.13 STEAM GENERATOR TUBE INSERVICE SURVEILLANCE

Applicability

Applies to inservice surveillance of the steam generator tubes.

Objective

To assure the continued integrity of the steam generator tubes that are a part of the primary coolant pressure boundary.

Specification

Steam generator tubes shall be determined operable by the following inspection program and corrective measures:

A. Inspection Requirements

1. Definitions

- a. Imperfection is an exception to the dimension, finish, or contour required by drawing or specification.
- b. Degradation means a service-induced cracking, wastage, wear or corrosion.
- c. Degraded Tube is a tube that contains imperfections caused by degradation large enough to be reliably detected by eddy current inspection. This is considered to be 20% degradation.
- d. % Degradation is an estimated% of the tube wall thickness affected or removed by degradation.
- e. Defect is a degradation of such severity that it exceeds the plugging limit. A tube containing a defect is defective.
- f. Plugging Limit is the degradation depth at or beyond which the tube must be removed from service. This is considered to be a degradation depth of 40%.

- g. Tube Inspection is an inspection of the hot leg side tube length. To the extent practical, this shall include the length from the point of entry around the U-bend to the top support of the cold leg.

2. Sample Size and the Number of Steam Generators to be Inspected.

- a. At the first inservice inspection subsequent to the pre-service inspection, six percent of the tubes in each of two steam generators shall be inspected as a minimum.
- b. At the second inservice inspection subsequent to the pre-service inspection, twelve percent of the tubes in one of the two steam generators not inspected during the first inservice inspection shall be inspected as a minimum.
- c. At the third inservice inspection subsequent to the pre-service inspection, twelve percent of the tubes in the steam generator not inspected during the first two inservice inspections shall be inspected as a minimum.
- d. Fourth and subsequent inservice inspections may be limited to one steam generator on a rotating schedule encompassing 3 N% of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner.
- e. Under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances, the sample sequences shall be modified to inspect the steam generator with the most severe conditions.
- f. Unscheduled inspections shall be conducted on the affected steam generator(s) in accordance with the first sample inspection specified in Table 4.13-1 in the event of primary-to-

secondary tube leaks (not including leaks originated from tube-to-tube sheet welds) 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 steam line or feedwater line break.

3. Extent and Result of Steam Generator Tube Inspection

- a. The minimum sample size, inspection result classification, and the corresponding action required are specified in Table 4.13-1.
- b. Tubes for the inspection should be selected on a random basis except where experience in similar plants with similar water chemistry indicates critical areas to be inspected.
- c. The first sample inspection subsequent to the preservice inspection shall include all nonplugged tubes that previously had detectable wall penetration ($> 20\%$) and shall also include tubes in those areas where experience has indicated potential problems.
- d. The second and third sample inspections in Table 4.13-1 may be limited to the partial tube inspection only, concentrating on tubes in the areas of the tube sheet array and on the portion of the tube where tubes with imperfections were found.
- e. In all inspections, previously degraded tubes must exhibit significant ($> 10\%$) further wall penetration to be included in the percentage calculation for the result categories in Table 4.13-1.

4. Interval of Inspection

- a. Subsequent to the first inservice inspection of steam generators, completed during the first refueling outage, inservice inspections shall be performed not less than 12 or more than 24 calendar months after the previous inspection.
- b. If the results of two consecutive inspections, not including the preservice inspection, all fall in the C-1 category specified in Table 4.13-1, the frequency of inspection may be extended to 40-month intervals. Also, if it can be demonstrated through two consecutive inspections that previously observed degradation has not continued and no additional degradation has occurred, a 40-month inspection interval may be initiated.

B. Corrective Measures

All leaking tubes and defective tubes shall be plugged.

C. Reports

The results of these steam generator tube inservice inspections shall be included in the Annual Operating Report for the period in which the inspections were completed.

Basis

Inservice inspection of steam generators is essential in order to monitor the integrity of the tubing and to maintain surveillance in the event that there is evidence of mechanical damage or progressive

deterioration due to design, manufacturing errors, or chemical imbalance. Inservice inspection of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation so that corrective measures can be taken.

An essentially 100% tube inspection was performed on each tube in every steam generator by eddy current techniques prior to service in order to establish a baseline condition for the tubing. This inspection was conducted under conditions and with equipment and techniques equivalent to those expected to be employed in the subsequent inservice inspections. Following changeover to all volatile treatment (AVT) in March, 1975, a baseline inspection was conducted prior to resumption of power operation.

Wastage-type defects are unlikely with the all volatile treatment (AVT) of secondary coolant. However, even if this type of defect occurs, the steam generator tube surveillance specification will identify steam generator tubes with degradation having a depth greater than 40% of the 0.050 inch tube wall thickness as being unacceptable for continued service. The results of steam generator tube burst and collapse tests have demonstrated that tubes having wall thickness not less than 0.025 inch have adequate margins of safety against failure due to loads imposed by normal plant operation and design basis accidents.

A 10% allowance for tube degradation that may occur between inservice tube examinations added to the 40% tube plugging limit provides an adequate margin to assure that SG tubes acceptable for operation will not have a minimum tube wall thickness less than the acceptable 50% or normal tube wall thickness (i.e., 0.025 in) during the service lifetime of the tubes.

Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect wastage type defects that have penetrated 20% of the original 0.050 inch wall thickness.

This program for inservice inspection of steam generator tubes is based on Regulatory Guide 1.83, Revision 1, dated July 1975.

TABLE 4.13-1
STEAM GENERATOR TUBE INSPECTION

First Sample Inspection			Second Sample Inspection		Third Sample Inspection		
Minimum Size	Result	Action	Result	Action	Result	Action	
S* Tubes per steam generator	C-1					▷	
	C-2	Plug defective tubes. Inspect additional 2 S tubes in this SG.	C-1			▷	Go to power.
			C-2	Plug defective tubes. Inspect additional 4 S tubes in this SG.	C-1	▷	
			C-3		C-2	Plug defective tubes. Go to power	
	C-3	Inspect all tubes in this SG. Plug defective tubes. Inspect 2 S tubes in each other SG.	C-3	Go to first sample. C-3 action			
			All other SGs C-1			▷	Go to power
			Some SGs C-2 But no add'l C-3	Go to second sample. C-2 action			
	Add'l SG C-3	Inspect all tubes in all SGs. Plug defective tubes.			▷	Report to NRC. NRC approval req'd prior to startup.	

* $S = 3 \frac{N}{n} \%$ where N is the number of steam generators in the plant, and n is the number of steam generators inspected during an inspection.

Category C-1: Less than 5% of the total tubes inspected are degraded tubes and none of them is defective.

Category C-2: One or more of the total tubes inspected is defective but not more than 1% of the tubes inspected; or between 5 and 10% of the tubes inspected are degraded tubes.

Category C-3: More than 10% of the total tubes inspected are degraded or more than 1% of the tubes inspected are defective.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 31 TO FACILITY OPERATING LICENSE NO. DPR-26
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

Introduction

By letter dated December 9, 1976, Consolidated Edison Company of New York (Con Ed) submitted an application to amend the Technical Specifications appended to Facility Operating License No. DPR-26 for Indian Point Nuclear Generating Unit No. 2 to add surveillance requirements for the steam generator tube inservice inspection program.

Discussion

By letter dated September 21, 1976, we requested that Con Ed establish a steam generator inspection program for Indian Point Unit No. 2. Model Technical Specifications enclosed with our letter were based on guidance contained in Revision No. 1 to Regulatory Guide 1.83. The Model Technical Specifications provide for (1) a requirement for periodic steam generator tube inspections, (2) a minimum number of steam generator tubes in each sample, and (3) acceptance criteria with regard to steam generator tube integrity.

In response to our letter dated September 21, 1976, Con Ed submitted, on December 9, 1976, proposed Technical Specifications for steam generator tube inspection, which satisfy, in both form and content, the substantive requirements contained in our Model Technical Specifications.

The proposed Indian Point Unit No. 2 Technical Specifications, with proper attention given to plant differences, are a duplicate of the presently in-force Indian Point Unit No. 3 steam generator tube surveillance Technical Specifications.

Evaluation (of steam generator surveillance requirements)

Structures, systems, and components important to safety of a nuclear power plant are designed, fabricated, constructed, and tested so as to provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. To continuously maintain such assurance, General Design Criterion 32 requires that components which are part of the reactor coolant pressure boundary be designed to permit periodic inspection and testing of important areas and features to assess their structural and leaktight integrity. The steam generator tubing is part of the reactor coolant system pressure boundary and is an important part of a major barrier against fission product release to the environment. It also acts as a barrier against steam release to the containment in the event of a loss of coolant accident (LOCA). To act as an effective barrier, this tubing must be free of cracks, perforations, and general deterioration. For this reason, a program of periodic inservice inspection is being established to assure the continued integrity of the steam generator tubes over the service life of the plant.

Generally, the major elements of the proposed steam generator tube inservice inspection program for Indian Point Unit No. 2 consist of specified: (a) sample selection, (b) examination methods, (c) inspection intervals, (d) acceptance criteria, and (e) reporting requirements. Each of these major elements of the program is separately evaluated below.

(a) Sample Selection

The proposed sampling scheme is generally patterned after Regulatory Guide 1.83, Revision 1, "Inservice Inspection of Pressurized Water Reactor Steam Generator Tubes". However, there are some deviations from Regulatory Guide 1.83 that we require to improve the program and/or reduce the potential radiation exposure of personnel who must perform the inspections. The principal deviations from Regulatory Guide 1.83 supplementary sampling requirements are evaluated below:

- (i) Regulatory Position C.5.a, "Supplementary Sampling Requirements", recommends that if the eddy current inspection results during an inservice inspection indicate any tubes with previously undetected imperfections of 20% or greater depth, additional steam generators, if any, should be inspected. In other words, because of a single tube in one steam

generator with previously undetected imperfection of 20% or greater depth but still well below the plugging limit, all steam generators in the plant should be inspected. Although the detection of any defect warrants further inspection to determine the extent of degradation in the steam generators, we believe that this inspection should be expanded initially to determine the extent of any further degradation in the steam generator under inspection. If the expanded inspection indicates more extensive defect conditions, then expansion to the other steam generators is required. This approach will provide careful stepwise expansion of inspection based on the results of successive steps, while tending to minimize the exposure of inspection personnel resulting from initial positioning of inspection equipment in a steam generator. This inspection approach is appropriate for this facility in which system characteristics are such that all steam generators are expected to perform in a similar manner.

- (ii) Regulatory Guide 1.83, Revision 1, requires additional tube inspections in the steam generator being inspected if the initial inspection results indicate that more than 10% of the inspected tubes have detectable wall penetration of greater than 20% or that one or more tubes inspected have an indication in excess of the plugging limit. The additional inspections require a complete tube inspection of an additional 3% and if required a third inspection of 6% of the tubes. The programs set forth in the Indian Point Unit No. 2 Technical Specifications require a second inspection doubling the number of tubes inspected in the first sample. Again if more than 10% of the tubes show a detectable penetration greater than 20% or 1% are defective tubes, a third sample is required again doubling the number of tubes inspected in the second sample. In the first sample, sampling is to concentrate on areas of the tube array where prior inspections or experience have indicated potential problems, and full length traverse of each inspected tube is required. For a second or third sample, if required, the inspection may concentrate on areas of the tube array and portions of the tube in which the first sample or the second sample indicated potential problems.

Based on the considerations discussed above, we have concluded that the sample selection scheme is acceptable.

(b) Examination Method

The proposed examination methods include nondestructive examination by eddy current testing. The specified methods are capable of locating and identifying stress corrosion cracks and tube wall thinning from chemical wastage, mechanical damage or other causes. Based on our review of these methods, and experience gained using these methods by the industry, we have concluded that the examination methods are acceptable.

(c) Inspection Intervals

The proposed inspection intervals are compatible with those recommended in Regulatory Guide 1.83, and we conclude the intervals are acceptable.

(d) Acceptance Criteria

The principal parameter used to determine whether any one steam generator tube is acceptable for continued service is the measured imperfection depth. In order to specify what level of imperfection is acceptable, a tube "plugging limit" is established. The "plugging limit" is defined in the Technical Specifications as the imperfection depth beyond which the tube must be removed from service, because the tube may become defective prior to the next scheduled inspection. For Indian Point Unit No. 2 the "plugging limit" is 40% of the nominal tube wall thickness.

Con Ed and the NRC staff have mutually agreed upon this 40% plugging limit in the definitions section of the Technical Specifications. This plugging limit will provide, in our opinion, conservative protection against wastage corrosion tube degradation. Con Ed will be required in the future to recalculate the plugging limit using the recommendations of Regulatory Guide 1.121¹.

Based on our review, the acceptance criteria are satisfactory.

(e) Reporting Requirements

Regulatory Guide 1.83, Revision 1, requires a licensee to report to the Commission and to await resolution and approval of the proposed remedial action when the inspection results exceed the limits specified in the Guide. It also states that additional sampling and more frequent inspection may be required. In the proposed Technical Specifications, it is clearly stated what additional inspection Con Ed must perform without reporting to

¹Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes," August, 1976.

the NRC and requires (1) a complete report on the inspection in the next annual operating report, and (2) in the most severe cases described in the Technical Specifications, prompt notification of the NRC must be made together with a written followup.

It is our position that the reporting requirements are reasonable and will facilitate reporting of pertinent information without unnecessarily increasing plant downtime. Therefore, they are acceptable.

In summary, we have concluded that the proposed steam generator tube inservice inspection program will provide added assurance of the continued integrity of the steam generator tubes, and thus is acceptable.

Environmental Considerations

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 28, 1977

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-247

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 31 to Facility Operating License No. DPR-26, issued to Consolidated Edison Company of New York, Inc. (the licensee), which revised Technical Specifications for operation of the Indian Point Nuclear Generating Unit No. 2 (the facility) located in Buchanan, Westchester County, New York. The amendment is effective as of its date of issuance.

The amendment establishes provisions in the Technical Specifications for steam generator tube inspection that are consistent with the guidance contained in Regulatory Guide 1.83, Revision 1, dated July 1975.

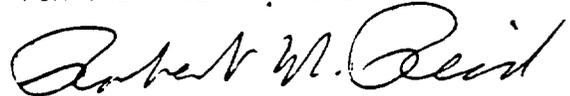
The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement, negative declaration or environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment transmitted by letter dated December 9, 1976, (2) Amendment No. 31 to License No. DPR-26, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Hendrick Hudson Free Library, 31 Albany Post Road, Montrose, New York. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this 28th day of June 1977.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors