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October 21, 1982

Docket No. 50-247

Mr. John D. O'Toole, Vice President  
 Nuclear Engineering and Quality Assurance  
 Consolidated Edison Company  
 of New York, Inc.  
 4 Irving Place  
 New York, New York 10003

Dear Mr. O'Toole:

The Commission has issued the enclosed Amendment No. 81 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2. This amendment consists of changes to the Technical Specifications in response to your application transmitted by letter dated August 18, 1982.

The amendment modifies your Technical Specifications to redefine the inspection requirements for the tubes in your steam generators. During the course of the staff review, certain modifications were proposed to your original submittal. These modifications have been agreed to by your staff and are incorporated in this amendment.

The staff also reviewed your proposed steam generator inspection program for the current refueling outage. Certain modifications were proposed by the NRC staff and agreed to by your staff. Your inspection program is acceptable as described in the Safety Evaluation for this amendment.

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

Sincerely,

Original signed by

Steven A. Varga, Chief  
 Operating Reactors Branch No. 1  
 Division of Licensing

Enclosures:

1. Amendment No. 81 to DPR-26
2. Safety Evaluation
3. Notice of Issuance

cc w/enclosures:  
 See next page

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 AMENDMENT

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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. 81  
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) dated August 18, 1982, 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.

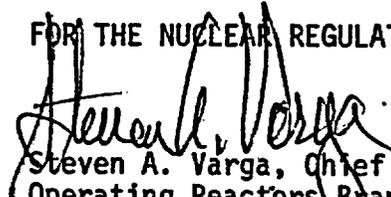
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-26 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 81, 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

  
Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: October 21, 1982

ATTACHMENT TO LICENSE AMENDMENT NO. 81

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Revise Appendix A as follows:

Remove Pages

4.13-1 through 4.13-5

Table 4.13-1

Insert Pages

4.13-1 through 4.13-12

Table 4.13-1

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 a deviation from the dimension, finish, or contour required by drawing or specification.

- b. Deformation is a deviation from the initial circular cross-section of the tubing. Deformation includes the deviation from the initial circular cross-section know as denting.
- c. Degradation means service-induced cracking, wastage, pitting, wear or corrosion (i.e. service-induced imperfections).
- d. 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.
- e. % Degradation is an estimated % of the tube wall thickness affected or removed by degradation.
- f. Defect is a degradation of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

- g. Plugging Limit is the degradation depth at or beyond which the tube must be plugged.
- h. Hot-Leg Tube Examination is an examination of the hot leg side tube length. This shall include the length from the point of entry at the hot leg tube sheet around the U-bend to the top support of the cold leg.
- i. Cold Leg Tube Examination is an examination of the cold leg side tube length. This shall include the tube length between the top support of the cold leg and the face of the cold leg tube sheet.

2. Extent and Frequency of Examination

- a. Subject to the conditions of specification 4.13.C.5 and/or 4.13.C.6, steam generator examinations shall be conducted not later than after sixteen equivalent months of operation (i.e. operation with a primary coolant temperature greater than 350 F) or not later than twenty calendar months from the date of restart after the previous examination, whichever comes first.

- b. Scheduled examinations shall include each of the four steam generators in service.
- 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 steam line 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 3.a above shall be subjected to a cold leg examination
- c. 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.
- d. Examination for deformation ("dents") shall be either by eddy current or by profilometry.
- e. Examination for degradation other than deformation shall be by eddy current techniques, using a 700 mil diameter probe. If the 700 mil diameter probe cannot pass through the tube, a 610 mil diameter probe shall be used. For examination of the U-bends and cold-legs of tubes in rows 2 through 5, a 540 mil diameter probe may be used, provided it is justified by profilometry measurement within the tensile strain criterion.

4. Additional Examination Criteria -

1. Degradation Not Caused by Denting

- a. If 5% or more of the tubes examined in a steam generator exhibit degradation or if any of the tubes examined in a steam generator are defective, additional examinations shall be required as specified in Table 4.13-1.
- b. Tubes for additional examination shall be selected from the affected area of the tube array and the examination may be limited to that region of the tube where degradation or defective tube(s) were detected.
- c. 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.

2. Degradation Caused by Denting

- a. Additional examinations, for degradation caused by denting, shall be performed as described in the most recent steam generator examination program approved by the NRC.

B. Acceptance Criteria and Corrective Action

1. Tubes shall be considered acceptable for continued service if:
  - a. Depth of degradation is less than 40% of the tube wall thickness, and
  - b. The tube will permit passage of a 0.540" diameter probe and the strain in the tube wall (if measured) is less than the tensile strain criterion as specified in the approved examination program; or the tube will permit passage of a 0.610" diameter probe, in the absence of strain measurement.
2. Tubes that are not considered acceptable for continued service shall be plugged.

C. Reports and Review and Approval of Results

1. The proposed steam generator examination program shall be submitted for NRC staff review and concurrence at least 60 days prior to each scheduled examination.
2. The results of each steam generator examination shall be submitted to NRC within 45 days after the completion of the examination. A significant increase in the rate of denting or significant change in steam generator condition shall be reportable immediately.
3. An evaluation which addresses the long term integrity of small radius u-bends beyond row 1 shall be submitted within 60 days of any finding of significant hourglassing (closure) of the upper support plate flow slots.
4. Restart after the scheduled steam generator examination need not be subject to NRC approval.

5. In any event, NRC staff approval shall be obtained for operating for a period longer than eight equivalent months of operation or one calendar year from the date of restart after examination.

6. In the event of an unscheduled steam generator examination, NRC staff approval shall be obtained in order for the examination to serve as a basis for operation for an additional eight months equivalent operation from the date of the examination.

Basis

Inservice examination of steam generator tubing is essential if there is evidence of mechanical damage or progressive deterioration in order to assure continued integrity of the tubing. Inservice examination 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 examination was performed on each tube in each steam generator by eddy current techniques prior to service in order to establish a baseline condition for the tubing. No significant baseline

imperfections were identified. In addition, prior to the discontinuance of phosphate treatment and the institution of all-volatile treatment (AVT), a baseline inspection was conducted in March, 1975 before the 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 examination will identify tubes with significant degradation from this effect.

The results of steam generator tube burst and collapse tests have demonstrated that tubes having wall thickness of 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. An allowance of 10% for tube degradation that may occur between inservice tube examinations added to the 40% degradation depth provided in the acceptance criteria provides an adequate margin to assure that tubes considered acceptable for continued operation will not have a minimum tube wall thickness less than the acceptable 50% of normal tube wall thickness (i.e., 0.025 inch) during the service life-time of the tubes. Steam generator tube examinations of other operating plants have demonstrated the capability to reliably detect wastage type defects that have penetrated 20% of the original 0.050 inch wall thickness.

Examination of samples of tubes and support plates removed from steam generators have revealed that "denting" is caused by the accretion of steel corrosion products in the tube/support plate annuli. As these corrosion products are more voluminous than the support plate material from which they are derived, a compressive force is exerted on the tubes in the plane of the support plates, resulting in deformation of the tubes. If the deformation results in an ovalization of the tubes, the resulting strain is low and there is no risk of development of stress corrosion cracking in the tubes. However, if the deformation results in an irregular tube shape, the resulting strain may be high enough for the tube to become susceptible to stress corrosion cracking inservice, and it should be preventively repaired. Beginning with the steam generator examination to be conducted during the Cycle 5/6 Refueling Outage, the tensile strain criterion for profilometry shall be 25%. The 25% strain criterion is based on a review of data currently available from operating steam generators, and will be revised as necessary as more experience is gained with the evaluation of this measurement. In the future, this criterion may be revised, either higher or lower, based on steam generator examination results. The profilometry criterion to be used for any steam generator examination shall be established in the most recent program approved by NRC.

A first report on the R&D work leading to the development of profilometry entitled, "Profilometry of Steam Generator Tubes" dated August, 1980 was forwarded to NRC by Con Edison. Additional R&D work has improved the accuracy of the profilometer and the calculation of strain in a deformed tube.

Before the development of profilometry, a minor diameter of 0.610" was established as the criterion for continuing a tube in service. This criterion was used successfully for several years at Indian Point Unit 2 and at other plants, and appears to be sufficiently conservative so that it can be continued in the absence of more accurate strain determination by means of profilometry.

This program for inservice inspection of steam generator tubes exceeds the requirements of Regulatory Guide 1.83, Revision 1, dated July 1975.

**TABLE 4.13-1**  
**STEAM GENERATOR TUBE INSPECTION**

Minimum Size	First Sample Inspection		Second Sample Inspection		Third Sample Inspection		
	Result	Action	Result	Action	Result	Action	
12% tubes per steam generator hot leg plus 3% tubes per steam generator cold leg	C-1	-----	-----	-----	-----	Go to power.	
	C-2	Plug defective tubes.  Inspect additional 6% tubes in this S.G.	C-1	-----	-----	-----	Go to power.
			C-2	Plug defective tubes. Inspect additional 12% tubes in this S.G.	C-1	-----	Go to power.
					C-2	-----	Plug defective tubes. Go to power.
					C-3	-----	Go to first sample. C-3 action.
	C-3	-----	Go to first sample. C-3 action.	-----	-----	-----	
	C-3	Inspect all tubes this S.G. Plug defective tubes.    Inspect 6% tubes in each other S.G. if not included in the examination program	All other S.G.s C-1	-----	-----	-----	Go to power.
			Some S.G.s C-2 But no add'l C-3	Go to second sample. C-2 action	-----	-----	-----
			Add'l S.G. C-3	Inspect all tubes in all S.G.s. Plug defective tubes.	-----	-----	Report to NRC. NRC approval req'd prior to startup.

- 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 no more than 1% of the tubes inspected; or less than 10% of the tubes inspected are degraded tubes.
- Category C-3:** More than 10% of the total 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  
RELATED TO AMENDMENT NO. 81 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 August 18, 1982, Consolidated Edison Company of New York, Inc. submitted requests for approval of changes to the Facility Operating License and the Technical Specifications for Indian Point Unit No. 2 to incorporate various new requirements relative to steam generator examinations and the steam generator examination program planned for the upcoming 1982 refueling/maintenance outage. After several telephone discussions these submittals were modified to satisfy staff concerns.

Technical Specification changes include:

1. Addition of a definition for Cold-Leg Tube Examination to the present hot-leg tube examinations.
2. Steam generator examinations shall be conducted not later than after 16 equivalent months of operation or not later than 20 calendar months from the date of restart after the previous examination, whichever comes first.
3. At least 12% of the tubes in each steam generator shall be subjected to a hot-leg examination and 25% of these shall be subjected to a cold-leg examination.
4. For dented tubes, tubes are considered acceptable for continued service if the tube will permit passage of a 0.540 inch diameter probe and the strain in the wall is less than 25%, or the tube will permit passage of a 0.610 inch diameter probe in the absence of strain measurement.

The proposed steam generator tube inspection program includes the following:

1. Eddy current examination of both the hot and cold-leg of tubes for defects, dents and wall thinning in the crevice.
2. Profilometry examination of tubes to determine tube profiles and to measure tensile strain.

3. Photographs of the flow slots.
4. Secondary side examinations using a TV camera.
5. Ultrasonic examination of the circumferential weld between upper shell and transition cone on steam generators 22 and 23.

### DISCUSSION

The steam generators at Indian Point 2 have experienced moderate degrees of tube denting. Eddy current inspection and flow slot closure measurements made in December 1980 indicated that the denting process was continuing at a rate consistent with that observed previously at this unit, but at a slower rate than that has been observed at other units with more severe denting.

In 1980, eddy current inspections were performed in the hot leg and concentrated in the regions of the tube bundle where operating experience has shown denting to be most prevalent; namely, the patch plate boundary region, the peripheral "hardspot" areas, and tubes near the tube lane. In addition, a small sample of tubes in the interior of the bundle was also inspected. Tubes restricting passage of the standard 0.700 inch diameter eddy current probe were reinspected with a 0.610 inch diameter probe. As was done in previous inspections, all tubes restricting passage of the 0.610 inch diameter probe were preventively plugged, with the exception of four (4) tubes in steam generator 22 based on profilometry measurements of tensile strain made on all tubes which did not pass the 0.610 inch diameter probe.

The major difficulty associated with the conventional gauging inspection method is that the amount of tube restriction is not directly related to strain. Thus, the gauging technique does not provide a direct indication of the potential for stress corrosion cracking. The profilometry technique establishes the shape of the dent permitting the amount of strain to be determined. The purpose of the profilometry inspections performed during December 1980 outage was to provide a data base for the development of an improved plugging criteria based upon strain rather than tube restriction measurements alone.

During the 1980 inspection, the four tubes in steam generator 22 which did not permit the passage of the 0.610 inch diameter probe but in which profilometry demonstrated that the maximum strain was less than 18%, were retained in service. These tubes are still in operation and there is no indication of any leaking. The strain was measured using an eight-finger probe. Reanalysis of this data indicated that the reported 18% strain which was composed of a circumferential membrane component and a bending component could be computed to a more realistic strain of 25% if the contributions from other strains such as axial, shear, etc. were included. This computation was based on radius measured graphically at 10° intervals in the same profile which resulted in the maximum combined strain in the hoop direction of 26.3%.

Based on these findings, the licensee proposes to use a 36 point rotating probe for profilometry measurements during the 1982 steam generator examination. This probe is a much improved probe whose accuracy is believed to be plus or minus 1% or less. Consequently, the licensee proposes that during the 1982 examination, 25% strain be set as the limit below which a tube may be retained in service and above which a tube will be repaired or plugged.

The licensee's proposed changes to the Technical Specification are designed to make them consistent with the scope of inspections being conducted and to provide acceptance criteria for dented tubes that are not presently in the Technical Specifications.

## EVALUATION

### AMENDMENTS TO TECHNICAL SPECIFICATION

The requested Technical Specification changes dealing with cold-leg inspections, examination frequency, amount of inspections per steam generator, and acceptance criteria for plugging of dented tubes based on profilometry measurements are acceptable for the following reasons:

1. The present Technical Specifications for Indian Point Unit 2 do not require that steam generator tubes be inspected on the cold-leg side; and hence, previous inspections have not been planned for cold-leg inspections. The licensee was required to do cold-leg inspections in April 1981 after the December 1980 hot-leg inspections had been completed. This was prompted by a leak on the cold-leg side. Six tubes which did not permit passage of the 0.540 inch diameter probe, were found and were plugged. Denting appears to have started in the cold-leg side of the steam generators and, therefore, inclusion of cold-leg inspections as a requirement of the Technical Specifications is justifiable. The licensee has indicated that there are problems inspecting row 2 and 3 tubes on the cold leg side when inserting the probe on the hot leg side. The staff finds it acceptable to exclude the row 2 and 3 tubes from the cold leg inspection providing that the total number inspected on the cold leg side remains at a constant percentage as written in the Technical Specifications.
2. The present Technical Specifications require that steam generator tube inspections be performed not less than 12 or more than 24 calendar months after the previous inspection. The requested change to an interval of not later than 16 equivalent months of operation or not later than 20 calendar months from the date of restart after the previous examination, whichever comes first, is not inconsistent with past requirements and has previously been accepted by the staff.
3. The present Technical Specifications require a minimum tube sample size of six (6) percent of the tubes in each of two (2) steam generators. The change to 12% of the tubes in each steam generator is consistent with the minimum examination performed at the last inspection in December 1980.
4. The present Technical Specifications contain no acceptance criteria for dented tubes. The proposed acceptance criteria is based on passage of the 0.610 inch diameter probe or if the tube restricts the 0.610 diameter probe, it must pass the 0.540 inch diameter probe and the tensile strain measured by profilometry must be 25% or less.

The 25% strain criterion is based on a limited number of tubes that have operated over the past cycle with that amount of strain without developing leaks. The 25% strain criterion, therefore, is only conditionally acceptable until future inspection results and further staff's evaluation indicate its acceptability.

#### STEAM GENERATOR INSPECTION PROGRAM

The proposed steam generator inspection program is consistent with the proposed Technical Specifications in magnitude and scope. The eddy current inspections will be performed on hot and cold-leg tubes in regions where operating experience has shown denting to be most prevalent. The licensee will visually inspect the secondary side of two steam generators via TV camera this refueling outage. The other two steam generator secondary sides will be inspected in subsequent refueling outages. The inspection program is, therefore, acceptable.

It should be noted that the steam generator inspection program is not part of the Technical Specifications. This is done deliberately to allow flexibility as the inspections are performed. However, any modifications to the inspection program as submitted in writing will require verbal concurrence from the NRR staff. Also the inspection program submittal provides a baseline description. Naturally if defects are found in any area, i.e., in the tubes or shell, the program will be expanded.

The licensee's proposal to use single frequency differential coils for dents and defects, and single frequency absolute coils for wall thinning in the crevice is adequate based on past inspections for known defects. However, multifrequency techniques should be considered for the future use to ensure the detection of defects not heretofore encountered.

#### SUMMARY

Based upon the above evaluation, we find that both the proposed Technical Specification changes and inspection program are acceptable except that the 25% strain criterion for plugging dented tubes is only conditionally acceptable until additional inspection results and further staff's evaluation indicate the continued adequacy of this value.

#### ENVIRONMENTAL CONSIDERATION

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 §51.5(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 an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, 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 the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: October 21, 1982

UNITED STATES NUCLEAR REGULATORY COMMISSIONDOCKET NO. 50-247CONSOLIDATED 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. 81 to Facility Operating License No. DPR-26, issued to the 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 the date of issuance.

The amendment modifies the Technical Specifications to redefine the inspection procedures for tubes in the steam generators.

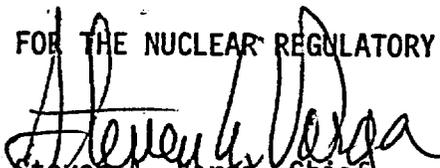
The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter 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 or negative declaration and 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 dated August 18, 1982, (2) Amendment No. 81 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 White Plains Public Library, 100 Martine Avenue, White Plains, 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 Licensing.

Dated at Bethesda, Maryland, this 21st day of October 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Steven A. Varga, Chief  
Operating Reactors Branch No. 1.  
Division of Licensing