

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

January 26, 1993

Docket No. 50-247

Mr. Stephen B. Bram Vice President, Nuclear Power Consolidated Edison Company of New York, Inc. Broadway and Bleakley Avenue Buchanan, New York 10511

Dear Mr. Bram:

SUBJECT: ISSUANCE OF AMENDMENT FOR INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 (TAC NO. M84258)

The Commission has issued the enclosed Amendment No. 160 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 August 7, 1992, as supplemented by letter dated January 5, 1993.

The amendment revises the Indian Point Nuclear Generating Unit No. 2 Technical Specifications to delete the snubber listing, Table 3.12-1, in Section 3.12. The amendment is in accordance with NRC Generic Letter 84-13 which permitted the removal of snubber listings from Technical Specifications and NRC Generic Letter 91-08 which addressed administrative controls for component lists that are removed from Technical Specifications.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely.

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Francis J/Williams, Jr., Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

- Enclosures: 1. Amendment No. 160 to DPR-26 Safety Evaluation
- 2.

cc w/enclosures: See next page

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Regional Administrator, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406 DATED: January 26, 1993

AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT UNIT 2

Docket File NRC & Local PDRs PDI-1 Reading S. Varga, 14/E/4 J. Calvo, 14/A/4 R. Capra C. Vogan F. Williams OGC-WF D. Hagan, 3302 MNBB G. Hill (2), P1-22 Wanda Joncs, P-370 C. Grimes, 11/F/23 ACRS (10) OPA OC/LFMB Plant File C. Cowgill, Region I cc: Plant Service list

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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. 160 License No. DPR-26

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of of New York, Inc. (the licensee) dated August 7, 1992, as supplemented by letter dated January 5, 1993, 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.
- 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) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 160, 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 to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert a. Copia

Robert A. Capra, Director Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: January 26, 1993

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ATTACHMENT TO LICENSE AMENDMENT NO. 160

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Revise Appendix A as follows:

Remove Pages Insert Pages vi vi 3.12-1 3.12-1 Table 3.12-1 (11 pages) Table Deleted 4.12-1 4.12-1 4.12-2 4.12-2 4.12-3 4.12-3 4.12-4 4.12-4 4.12-5 4.12-5 6-25 6-25

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Amendment No. 160

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3.12 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to the operability of snubbers required for protection of safety-related components.

<u>Objective</u>

To define the time during which reactor operation is permitted after detection of inoperable snubbers.

Specifications

- 1. All snubbers which are located on systems required for the current mode of operation shall be operable.^{*} The only snubbers excluded from this requirement are those installed on non-safety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.
- 2. During power operation, the requirements of Specification 3.12.1 may be modified to allow one or more snubbers to be inoperable subject to the following conditions:
 - a. The inoperable snubber must be restored to service within 72 hours or the reactor shall be placed in the cold shutdown condition within the succeeding 36 hours.
 - b. Either of the following must be performed:

^{*} Snubber(s) taken out of service for maintenance and testing shall be considered inoperable unless returned to service within 72 hours.

4.12 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to the inspection and testing of all hydraulic snubbers addressed in Section 3.12 of the Technical Specifications.

Objective

To verify that snubbers will perform their design functions in the event of a seismic or other transient dynamic event.

Specifications

A. <u>VISUAL INSPECTION</u>

Snubbers whose seal material has been demonstrated by operating experience, laboratory testing, or analysis to be compatible with the operating environment shall be visually inspected to verify operability in accordance with the following schedule:

No. Inoperable Snubbers	Next Required Visual				
per Inspection Period	Inspection Period				
0	24 months ±25% #				
1	16 months ±25% #				
2	8 months ±25% #				
3,4	164 days ±25% #				
5,6,7	80 days ±25% #				
≥8	40 days ±25% #				

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers are categorized as accessible or inaccessible during reactor operation. These two groups may be inspected independently according to the above schedule except as noted below.

If snubber inoperability is identified due to excessive fluid leakage from the external tubing associated with the twenty-four snubbers installed at the steam generators, this group of snubbers may be inspected independently according to the above schedule.

Visual inspection shall verify that (1) there is no visual indication of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, the snubber has freedom of movement and is not frozen. Snubbers which appear inoperable as a result of visual inspection may be determined operable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible, and (2) the affected snubber is functionally tested in the as-found condition and determined operable per Specification 4.12.C, as applicable. However, when a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable, and cannot be determined operable via functional testing for the purpose of establishing the next visual inspection period unless the test is started with the piston in the as-found setting, extending the piston rod in the tension mode direction. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

B. FUNCTIONAL TESTING

 At least once every Refueling Interval (#) a representative sample of 10% of all the safety-related hydraulic snubbers shall be functionally tested for operability, including verification of proper piston movement,

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lock-up rate and bleed. For each hydraulic snubber found inoperable, an additional 10% of the total installed of that type of hydraulic snubber shall be functionally tested. This additional testing will continue until no failures are found or until all snubbers of the same type have been functionally tested.

At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

- 1. the first snubber away from each reactor vessel nozzle,
- snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.), and
- 3. snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers identified as "Especially Difficult to Remove" or in "High-Radiation Zones During Shutdown" shall also be included in the representative samples."

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and currently installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

* Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions.

- 2. For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting its designed service.
- 3. If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated, and if found to be caused by a manufacturer or design deficiency, all snubbers of the same manufacturer and model which are susceptible to the same defect and located in a similar environment shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

C. FUNCTIONAL TEST ACCEPTANCE CRITERIA

The snubber functional test shall verify that:

- 1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
- 2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

D. <u>RECORD OF SNUBBER SERVICE LIFE</u>

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.n. Concurrently with the first visual inspection and at least once during every Refueling Interval (#), the installation and maintenance records for each snubber shall be reviewed to verify that the

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indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be re-evaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This re-evaluation, replacement, or reconditioning shall be indicated in the records.

<u>Basis</u>

The visual inspection frequency is based upon maintaining a constant level of snubber protection. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible and verified operable by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, and are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. Ten percent of the installed hydraulic snubbers represents an adequate sample for such tests. Selection of a representative sample of hydraulic snubbers provides a confidence level within acceptable limits that these supports will be in an operable condition. Observed failures of these sample snubbers shall require functional testing of additional units of the same type.

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n. Records of the service lives of all snubbers addressed by Section 3.12 of the Technical Specifications, including the date at which the service life commences and associated installation and maintenance records.*

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

- 6.12.1 As an acceptable alternative to the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2):
 - a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of Specification 6.12.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry to such areas and the keys shall be maintained under the administrative control of the Watch Supervisor on duty.

^{*} The documentation referred to herein is required for all snubbers beginning with those replaced following the issuance of Amendment 112.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 160 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

1.0 INTRODUCTION

By letter dated August 7, 1992, as supplemented by letter dated January 5, 1993, the Consolidated Edison Company of New York (the licensee) submitted a request for changes to the Indian Point Nuclear Generating Unit No. 2, Technical Specifications (TS). The requested changes would delete the snubber listing, Table 3.12-1, in Section 3.12. In addition, the requested changes would also remove all references to the table. Guidance on the proposed TS changes was provided by Generic Letter 84-13 (GL 84-13), dated May 3, 1984, which permitted the removal of snubber listings from TS and by Generic Letter 91-08 (GL 91-08), dated May 6, 1991, which addressed administrative control for component lists that are removed from TS.

The January 5, 1993, submittal was necessary to update those revised pages which had been affected by issuance of Amendment 159 on December 10, 1992. This supplemental information did not change the initial proposed no significant hazards determination.

2.0 EVALUATION

The licensee has proposed the removal of Table 3.12-1, "Safety-Related Shock Suppressors (Snubbers)," that is referenced in Specification 3.12.1. The licensee has proposed to modify Specification 3.12.1 to change the wording from "All snubbers listed in Table 3.12-1 which are located on systems required...." to "All snubbers which are located on systems required...." In addition, the licensee has added the standard definition of snubbers excluded from the requirement as follows:

The only snubbers excluded from this requirement are those installed on non-safety related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system. The licensee has proposed to remove all references to Table 3.12-1 from the TS. This requires changes in Surveillance Sections 4.12, "Applicability;" 4.12 "Specification;" 4.12A, 4.12.B.1, and 4.12.D. It also requires a change in "Record Retention," Section 6.10.2.n.

The licensee has proposed changes to the TS that are consistent with the guidance provided in GL 84-13. In addition, the licensee has confirmed that the snubber list will be relocated to a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section 6.0 of the TS prior to approval of the amendment application. This is consistent with the guidance provided in GL 91-08.

On the basis of its review of this matter, the staff finds that the proposed change to the TS for Indian Point Nuclear Generating Unit No. 2 is primarily an administrative change that does not alter the requirements set forth in the existing TS. This change will allow the licensee to make corrections and updates to the list of snubbers for which these TS requirements apply, under the provisions that control changes to plant procedures as specified in the Administrative Controls Section of the TS. Therefore, the staff finds that the proposed TS changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (57 FR 45084). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Francis J. Williams, Jr.

Date: January 26, 1993

January 26, 1993

Docket No. 50-247

Mr. Stephen B. Bram Vice President, Nuclear Power Consolidated Edison Company of New York, Inc. Broadway and Bleakley Avenue Buchanan, New York 10511

Dear Mr. Bram:

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A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly <u>Federal</u> <u>Register</u> notice.

Sincerely, Original Signed By: Francis J. Williams, Jr., Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

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Enclosures:

1. Amendment No. 160 to DPR-26

2. Safety Evaluation

cc w/enclosures: See next page *See previous concurrence

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