Mr. A. Alan Blind
Vice President, Nuclear [illegible]er
Consolidated Edison Co[illegible]any
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

October 29 [illegible]9

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - ISSUANCE OF EXIGENT AMENDMENT RE: ALLOWING ONE-TIME EXTENSION OF SURVEILLANCE INTERVALS (TAC NO. MA5084)

Dear Mr. Blind:

The Commission has issued the enclosed Amendment No. 204 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 (TSs) in response to your application transmitted by letter dated March 26, 1999, as supplemented October 15, 1999.

The amendment allows for a one-time extension of system functional tests. The test intervals are extended for 37 months to coincide with the next refueling outage scheduled to commence on June 3, 2000.

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,

ORIGINAL SIGNED BY:

Jefferey F. Harold, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No. 204 to DPR-26
2. Safety Evaluation

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DATED: October 29, 1999

AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT UNIT 2

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J. Rogge, Region I

cc: Plant Service list

DATED: October 29, 1999

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Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

October 29, 1999

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Sincerely,

ORIGINAL SIGNED BY:

Jefferey F. Harold, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No. 204 to DPR-26
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NAME	JHarold		SLittle		S Peterson		RBachmann			
DATE	10/29/99		10/27/99		10/27/99		10/27/99		10/ /99	

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 29, 1999

Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - ISSUANCE OF EXIGENT AMENDMENT RE: ALLOWING ONE-TIME EXTENSION OF SURVEILLANCE INTERVALS (TAC NO. MA5084)

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Sincerely,

Jeffrey F. Harold

Jefferey F. Harold, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No. 204 to DPR-26
2. Safety Evaluation

cc w/encls: See next page

Indian Point Nuclear Generating Station
Units 1/2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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. 204
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 March 26, 1999, as supplemented October 15, 1999, 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:

9932020223

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No204 , 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

Sheri Peterson

Sheri Peterson, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 29, 1999

ATTACHMENT TO LICENSE AMENDMENT NO.

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
6a	6a
Table 1-1	Table 1-1
Table 4.1-1 (page 2 of 7)	Table 4.1-1 (page 2 of 7)
Table 4.1-1 (page 3 of 7)	Table 4.1-1 (page 3 of 7)
Table 4.1-1 (page 5 of 7)	Table 4.1-1 (page 5 of 7)
Table 4.1-3 (page 1 of 1)	Table 4.1-3 (page 1 of 1)
4.4-2	4.4-2
4.4-3	4.4-3
4.4-4	4.4-4
4.4-5	4.4-5
4.5-1	4.5-1
4.5-2	4.5-2
4.5-11	4.5-11
4.6-1	4.6-1
4.6-2	4.6-2
4.12-3	4.12-3
4.12-4	4.12-4
4.12-6	4.12-6

TABLE 1-1

Frequency Notation

Notation	Test Frequency/Requirements	Surveillance Interval
Shift (S)	At least twice per calendar day	N.A.
Daily (D)	At least once per calendar day	N.A.
Weekly (W)	At least once per week	7 days
Monthly (M)	At least once per month	31 days
Quarterly (Q)	At least once per three months	92 days
Semi-Annually(SA)	At least once per six months	6 months
Annually (A)	At least once per 12 months	12 months
Refueling Interval (R#)	At least once every 24 months	24 months
Refueling Interval (R)	At least once every 18 months	18 months
S/U	Prior to each reactor startup	--
P	Completed prior to each release	--
N.A.	Not Applicable	
Refueling Interval (R##)	At least once every 24 months except a one time extension of the test interval to allow the test to be performed during the refueling outage starting no later than June 3, 2000	--

2K. Consolidated Edison Company of New York, Inc. shall implement and maintain in effect all provisions of the NRC-approved fire protection program as described in the Updated Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Reports dated November 30, 1977, February 3, 1978, January 31, 1979, October 31, 1980, August 22, 1983, March 30, 1984, October 16, 1984, September 16, 1985, November 13, 1985, March 4, 1987, January 12, 1989, and March 26, 1996. The licensee may make changes to the NRC-approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

L. The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals. (R##)

M. The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels

	Channel Description	Check	Calibrate	Test	Remarks
13.	Residual Heat Removal Pump Flow	N.A.	R##	N.A.	
14.	Boric Acid Tank Level	W	R#	N.A.	Bubbler tube rodded during calibration
15.	Refueling Water Storage Tank Level	W	Q	N.A.	
16.	DELETED				
17.	Volume Control Tank Level	N.A.	R#	N.A.	
18a.	Containment Pressure	D	R#	Q	Wide Range
18b.	Containment Pressure	S	R#	Q	Narrow Range
18c.	Containment Pressure (PT-3300,PT-3301)	M	R#	N.A.	High Range
19.	Process Radiation Monitoring System	D	R#	M	
19a.	Area Radiation Monitoring System	D	R#	M	
19b.	Area Radiation Monitoring System (VC)	D	R#	M	
20.	Boric Acid Make-up Flow Channel	N.A.	R#	N.A.	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels

	Channel Description	Check	Calibrate	Test	Remarks
21a.	Containment Sump and Recirculation Sump Level (Discrete)	S	R#	R#	Discrete Level Indication Systems.
21b.	Containment Sump, Recirculation Sump and Reactor Cavity Level (Continuous)	S	R#	R#	Continuous Level Indication Systems.
21c.	Reactor Cavity Level Alarm	N.A.	R#	R#	Level Alarm System
21d.	Containment Sump Discharge Flow	S	R#	M	Flow Monitor
21e.	Containment Fan Cooler Condensate Flow	S	R#	M*3	
22a.	Accumulator Level	S	R#	N.A.	
22b.	Accumulator Pressure	S	R#	N.A.	
23.	Steam Line Pressure	S	R#	Q	
24.	Turbine First Stage Pressure	S	R#	Q	
25.	Reactor Trip Logic Channel Testing	N.A.	N.A.	M*9	
26.	Engineered Safety Features (SI) Logic Channel Testing	N.A.	N.A.	M*9	
27.	Turbine Trip a. Low Auto Stop Oil Pressure	N.A.	R##	N.A.	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels

	Channel Description	Check	Calibrate	Test	Remarks
33.	PORV Block Valve Position Indicator (Limit Switch)	M*5	R#	R#	
34.	Safety Valve Position Indicator (Acoustic Monitor)	M	R#	R##	
35.	Auxiliary Feedwater Flow Rate	M	R#	R#	
36.	PORV Actuation/ Reclosure Setpoints	N.A.	R#	N.A.	
37.	Overpressure Protection System (OPS)	N.A.	R#	*6	
38.	Wide Range Plant Vent Noble Gas Effluent Monitor (R-27)	S	R#	N.A.	
39.	Main Steam Line Radiation Monitor (R-28, R-29, R-30, R-31)	S	R#	N.A.	
40.	High Range Containment Radiation Monitor (R-25, R-26)	S	R#*7	N.A.	
41.	Containment Hydrogen Monitor	Q	Q*8	N.A.	

Table 4.1-3

Frequencies for Equipment Tests

		Check	Frequency	Maximum Time Between Tests
1.	Control Rods	Rod drop times of all control rods	Refueling # Interval	*
2.	Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations	*
3.	Pressurizer Safety Valves	Setpoint	Refueling Interval (R##)	*
4.	Main Steam Safety Valves	Setpoint	Refueling Interval (R##)	*
5.	Containment Isolation System	Automatic Actuation	Refueling Interval (R##)	*
6.	Refueling System Interlocks	Functioning	Each refueling shutdown prior to refueling operation	Not Applicable
7.	Diesel Fuel Supply	Fuel Inventory	Weekly	10 days
8.	Turbine Steam Stop Control Valves	Closure	**	**
9.	Cable Tunnel Ventilation Fans	Functioning	Monthly	45 days

* See Specification 1.9.

** The turbine steam stop and control valves shall be tested at a frequency determined by the methodology presented in WCAP-11525 "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency", and in accordance with established NRC acceptance criteria for the probability of a missile ejection incident at IP-2. In no case shall the test interval for these valves exceed one year.

e. Closure of the containment isolation valves for the purpose of the test shall be accomplished by the means provided for normal operation of the valves.

2. Acceptance Criteria

The As Found measured leakage rate shall be less than 1.0 L_a where L_a is equal to 0.1 w/o per day of containment steam air atmosphere at 47 psig and 271°F, which are the peak accident pressure and temperature conditions. Prior to entering a mode where containment integrity is required, the As Left leakage rate shall not exceed 0.75 L_a.

3. Frequency

The integrated leakage rate test frequency shall be performed in accordance with 10 CFR 50 Appendix J, Option B as modified by approved exemptions and in accordance with guidelines contained in Regulatory Guide 1.163, dated September 1995.

B. SENSITIVE LEAKAGE RATE

1. Test

A sensitive leakage rate test shall be conducted with the containment penetrations, weld channels, and certain double-gasketed seals and isolation valve interspaces at a minimum pressure of 52 psig and with the containment building at atmospheric pressure.

2. Acceptance Criteria

The test shall be considered satisfactory if the leak rate for the containment penetrations, weld channel and other pressurized zones is equal to or less than 0.2% of the containment free volume per day.

3. Frequency

A sensitive leakage rate test shall be performed at every Refueling Interval (R##).

C. AIR LOCK TESTS

1. The containment air locks shall be tested at a minimum pressure of 47 psig. The test shall be performed in accordance with 10 CFR 50 Appendix J, Option B, as modified by approved exemptions and in accordance with guidelines contained in Regulatory Guide 1.163, dated September 1995. The acceptance criteria is included in Specification 4.4.D.2.a.

2. Whenever containment integrity is required, verification shall be made of proper repressurization to at least 47 psig of the double-gasket air lock door seal upon closing an air lock door.

D. CONTAINMENT ISOLATION VALVES

1. Tests and Frequency

a. All isolation valves in Table 4.4-1 shall be tested for operability in accordance with 10 CFR 50 Appendix J, Option B, as modified by approved exemptions and in accordance with guidelines contained in Regulatory Guide 1.163, dated September 1995.

b. Isolation valves in Table 4.4-1 which are pressurized by the Weld Channel and Containment Penetration Pressurization System are leakage tested as part of the Sensitive Leakage Rate Test included in Specification 4.4.B.

c. Isolation valves in Table 4.4-1 which are pressurized by the Isolation Valve Seal Water System shall be tested at every refueling but in no case at intervals greater than a Refueling Interval (R##), as part of an overall Isolation Valve Seal Water System Test.

d. Isolation valves in Table 4.4-1 shall be tested with the medium and at the pressure specified therein.

2. Acceptance Criteria

a. The combined leakage rate for the following shall be less than 0.6 L_a: isolation valves listed in Table 4.4-1 subject to gas or nitrogen pressurization testing, air lock testing as specified in Specification 4.4.C.1, portions of the sensitive leakage rate test described in

Specification 4.4.B.1 which pertain to containment penetrations and double-gasketed seals.

b. The leakage rate into containment for the isolation valves sealed with the service water system shall not exceed 0.36 gpm per fan cooler.

c. The leakage rate for the Isolation Valve Seal Water System shall not exceed 14,700 cc/hr.

3. Containment isolation valves may be added to plant systems without prior license amendment to Table 4.4-1 provided that a revision to this table is included in a subsequent license amendment application.

E. CONTAINMENT MODIFICATIONS

Any major modification or replacement of components of the containment performed after the initial pre-operational leakage rate test shall be followed by either an integrated leakage rate test or a local leak detection test and shall meet the appropriate acceptance criteria of Specifications 4.4.A.2, 4.4.B.2, or 4.4.D.2. Modifications or replacements performed directly prior to the conduct of an integrated leakage rate test shall not require a separate test.

F. REPORT OF TEST RESULTS

A post-outage report shall be prepared presenting results of the previous cycle's Type B and Type C tests, and Type A, Type B, and Type C tests, if performed during that outage. The technical contents of the report are generally described in ANSI/ANS 56.8-1994, and will be available on-site for NRC review. The report shall also show that the applicable performance criteria are met and serves as a record that continuing performance is acceptable.

G. VISUAL INSPECTION

A detailed visual examination of the accessible interior and exterior surfaces of the containment structure and its components shall be performed at each Refueling Interval (R##) and prior to any integrated leak test to uncover any evidence of deterioration which may affect either the containment structural integrity or leak-tightness. The discovery of any significant deterioration shall be accompanied by corrective actions in accordance with acceptable procedures, non-destructive tests and inspections, and local testing where practical, prior to the conduct of any integrated leak test. Such repairs shall be

reported as part of the test results.

H. RESIDUAL HEAT REMOVAL SYSTEM

1. Test

a. (1) The portion of the Residual Heat Removal System that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 350 psig at the interval specified below.

(2) The piping between the residual heat removal pumps suctions and the containment isolation valves in the residual heat removal pump suction line from the containment sump shall be hydrostatically tested at no less than 100 psig at the interval specified below.

b. Visual inspection shall be made for excessive leakage during these tests from components of the system. Any significant leakage shall be measured by collection and weighing or by another equivalent method.

2. Acceptance Criterion

The maximum allowable leakage from the Residual Heat Removal System components located outside of the containment shall not exceed two gallons per hour.

3. Corrective Action

Repairs or isolation shall be made as required to maintain leakage within the acceptance criterion.

4. Test Frequency

Tests of the Residual Heat Removal System shall be conducted at least once every Refueling Interval (R##).

Basis

The containment is designed for a calculated peak accident pressure of 47 psig[1]. While the

Applicability

Applies to testing of the Safety Injection System, the Containment Spray System, the Hydrogen Recombiner System, and the Air Filtration System.

Objective

To verify that the subject systems will respond promptly and perform their design functions, if required.

Specifications

A. SYSTEM TESTS

1. Safety Injection System

a. System tests shall be performed at each reactor Refueling Interval (R##). With the Reactor Coolant System pressure less than or equal to 350 psig and temperature less than or equal to 350°F, a test safety injection signal will be applied to initiate operation of the system. The safety injection pumps are made inoperable for this test.

b. The test will be considered satisfactory if control board indication and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing; that is, the appropriate pump breakers shall have opened and closed, and the appropriate valves shall have completed their travel.

c. Conduct a flow test of the high head safety injection system after any modification is made to either its piping and/or valve arrangement.

d. Verify that the mechanical stops on Valves 856 A, C, D and E are set at the position measured and recorded during the most recent ECCS operational flow test or flow tests performed in accordance with (c) above. This surveillance procedure shall be performed

following any maintenance on these valves or their associated motor operators and at a convenient outage if the position of the mechanical stops has not been verified in the preceding three months.

B. CONTAINMENT SPRAY SYSTEM

1. System tests shall be performed at each reactor Refueling Interval (R##). The tests shall be performed with the isolation valves in the spray supply lines at the containment blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.

2. The spray nozzles shall be tested for proper functioning at least every five years.

3. The test will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

C. HYDROGEN RECOMBINER SYSTEM

1. Visual Inspection of both PARs at each refueling outage(#) shall be done to verify that there is no significant fouling by foreign materials.

2. A sample plate from each PAR shall be removed at each refueling outage and tested to verify response to a hydrogen mixture test gas.

D. CONTAINMENT AIR FILTRATION SYSTEM

Each air filtration unit specified in Specification 3.3.B shall be demonstrated to be operable:

1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the unit operates for at least 15 minutes.

2. At least once every Refueling Interval (#), or (1) after any structural maintenance on the HEPA filters or charcoal adsorber housings, or (2) at any time painting, fire or chemical releases could alter filter integrity by:

   a. verifying a system flow rate at ambient conditions of 65,600 cfm ±10% during filtration unit operation when tested in accordance with ANSI N510-1975. Verify that the flow rate through the charcoal adsorbers is ≥ 8,000 cfm.

be needed until approximately 13 days have elapsed following the accident. Use of the system will be based upon containment atmosphere sample analysis and availability of the hydrogen recombiners. When in use, HEPA filters and charcoal adsorbers will filter the containment atmosphere discharge prior to release to the plant vent. The required in-place testing and laboratory charcoal sample testing will verify operability of this venting system and provide further assurance that releases to the environment will be minimized.

As indicated for the previously mentioned engineered safety feature (ESF) air filtration systems, high-efficiency particulate absolute (HEPA) filters are installed upstream of the charcoal adsorbers to prevent clogging of these adsorbers. The charcoal adsorbers are installed to reduce the potential release of radioiodine to the environment. The laboratory charcoal sample testing periodically verifies that the charcoal meets the iodine removal efficiency requirements of Regulatory Guide 1.52, Revision 2. Should the charcoal of any of these filtration systems fail to

satisfy the specified test acceptance criteria, the charcoal will be replaced with new charcoal which satisfies the requirements for new charcoal outlined in Regulatory Guide 1.52, Revision 2.

References

(1) UFSAR Section 6.2
(2) UFSAR Section 6.4

1. In this instance Refueling Interval is defined by R##.

4.6 EMERGENCY POWER SYSTEM PERIODIC TESTS

Applicability

Applies to periodic testing and surveillance requirements of the emergency power systems.

Objective

To verify that emergency power systems will respond promptly and properly when required.

Specifications

The following tests and surveillances shall be performed as stated:

A. DIESEL GENERATORS

1. Each month, each diesel generator shall be manually started and synchronized to its bus or buses and shall be allowed to assume the normal bus load.

2. At each Refueling Interval (R##), each diesel generator shall be manually started, synchronized and loaded up to its continuous (nameplate) and short term ratings.

3. At each Refueling Interval (R##), to assure that each diesel generator will automatically start and assume the required load within 60 seconds after the initial start signal, the following shall be accomplished: by simulating a loss of all normal AC station service power supplies and simultaneously simulating a Safety Injection signal, observations shall verify automatic start of each diesel generator, required bus load shedding and restoration to operation of particular vital equipment. To prevent Safety Injection flow to the core, certain safeguards valves will be closed and made inoperable.

4. Each diesel generator shall be given a thorough inspection at least annually following the manufacturer's recommendations for this class of stand-by service.

The above tests will be considered satisfactory if the required minimum safeguards equipment operated as designed.

B. DIESEL FUEL TANKS

A minimum oil storage of 48,000 gallons will be maintained for the station at all times.

C. STATION BATTERIES (NOS. 21, 22, 23, & 24)

1. Every month, the voltage of each cell, the specific gravity and temperature of a pilot cell in each battery and each battery voltage shall be measured and recorded.

2. Every 3 months, each battery shall be subjected to a 24-hour equalizing charge, and the specific gravity of each cell, the temperature reading of every fifth cell, the height of electrolyte, and the amount of water added shall be measured and recorded.

3. Each time data is recorded, new data shall be compared with old to detect signs of abuse or deterioration.

4. At least once every Refueling Interval (R##) each battery shall be subjected to a load test and a visual inspection of the plates.

D. GAS TURBINE GENERATORS

1. At monthly intervals, at least one gas turbine generator shall be started and synchronized to the power distribution system for a minimum of thirty (30) minutes with a minimum electrical output of 750 kw.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months except for the Refueling Interval (R##) defined in Technical Specification Table 1-1.

Note 4: If the number of unacceptable snubbers is equal to or less than the number of Column B, but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C, but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Column B and C.

Note 6: The provisions of Specification 4.0.1 are applicable for all inspection intervals.

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 shall be classified as unacceptable and may be reclassified acceptable 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 unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the appropriate LCO action requirement shall be met.

B. FUNCTIONAL TESTING

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

   2. snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.), and

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. RECORD OF SNUBBER SERVICE LIFE

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 (R##), the installation and maintenance records for each snubber shall be reviewed to verify that the 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.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 204 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 a letter dated March 26, 1999, as supplemented October 15, 1999, the Consolidated Edison Company of New York, Inc., the licensee for the Indian Point Unit 2, requested NRC's approval to amend its Operating License DPR-26 by revising the Technical Specifications (TSs). The proposed change would modify TSs to allow a one-time extension of surveillance intervals for the following functional tests: (a) leak test of systems outside of containment; (b) residual heat removal (RHR) pump system flow - control room annunciator logic check; (c) low turbine auto stop oil pressure; (d) acoustic monitors; (e) setting of pressurizer safety valves; (f) main steam safety valves setpoint determination; (g) safety injection system; (h) sensitive leak rate test-type "b"; (i) isolation valve seal water system functional test; (j) internal containment structural visual inspection; (k) leak rate determination; (l) hydrogen recombiners; (m) emergency diesel generator load test; (n) safety injection system electrical load test; (o) station batteries; and (p) snubbers. The increase in surveillance intervals is due to an outage during 1998, which extended the operating cycle of the core, so that the next refueling outage scheduled to commence no later than June 3, 2000. The October 15, 1999, letter provided clarifying information that did not change the initial proposed no significant hazards consideration.

2.0 EVALUATION

2.1 Leak Test of Systems Outside Containment

The proposed change to License Condition 2.L is a one-time extension of the surveillance interval for the functional test of specified systems outside containment. License Condition 2.L specifies that a program be implemented to track and limit external leakage from systems outside the vapor containment, that would or could contain highly radioactive fluids during a serious transient or accident, to levels that are as low as is practicable. The overall program consists of six separate but complementary elements that collectively ensure compliance with the license requirement. Surveillance testing represents one of the elements used to monitor and maintain the leakage outside containment The surveillance test portion requires the licensee to perform testing of all potential highly radioactive flow paths for systems outside containment and maintain continuous monitoring of the total leakage against established criteria. PT-R95 Leak Test of Reuse Header, PT-R96 Leak Test of PACASS, and PT-R97 Leak Test of the Gas Analyzer, are three of the surveillance tests that are performed to monitor leakage outside containment. Currently, these surveillance tests are performed at a frequency of 24 months plus 25 percent. The proposed change is a one-time extension of 7 months. The

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acceptance criterion for all tests are "less that or equal to 150 cc/min." The engineering analysis for the 1989 and 1993 test results on PT-R96 concluded that although the test criteria were not met, the lack of external leakage demonstrated an acceptable implementation of the license condition. Neither of these conditions has been repeated over the last several tests. Although three tests were performed during 1989 through 1997 that did not meet the acceptable criteria, none of these resulted in external leakage. All anomalous conditions were corrected with no further unsatisfactory results in subsequent tests. No trends were noted in the test results that indicated the experienced anomalies were related to the time interval between test or could worsen with time. Therefore, a one-time extension of 7 months to perform the leakage test for selected systems outside containment is acceptable.

2.2 RHR System Flow - CCR Annunciator Logic Check

The proposed change to TS Table 4.1-1, Item 13, is a one-time extension of the surveillance interval for the functional test of the RHR System Flow - CCR (cental control room) Annunciator Logic Check. The licensee reviewed seven completed surveillance tests from March 1986 to the present. The logic check is a "go/no-go" logic check of the circuitry for the "Low Head Injection Line-Low Flow" annunciator on CCR panel SB-1. This annunciator logic requires the recirculation pump breaker to be closed and a low flow condition to be present at the required instruments before the annunciator logic is completed. The annunciator logic checked satisfactory for every test in the review period.

The check consists of placing the recirculation pump breakers in the testing mode and cycling each breaker closed then open. The time for the annunciator to activate is checked to be less than 30 seconds and the annunciator is verified to bring up and clear the "Low Head Injection Line-Low Flow." Since there is no allowable outage time for the recirculation pumps, this test may only be performed when the unit is in a cold shutdown condition. Therefore, based on the analysis of earlier test results, the one-time extension of 7 months for the functional test of the RHR System Flow-CCR Annunciator Logic Check is acceptable.

2.3 Low Turbine Auto Stop Oil Pressure

The proposed change to TS Table 4.1-1, Item 27a, is a one-time extension of the surveillance test interval for the functional test of the low turbine auto stop oil pressure. The low turbine auto stop oil pressure system provides a reactor trip on turbine trip above 35 percent power and provides protection from a load rejection in excess of the capability of the stream dump system. A turbine trip signal energizes and opens the main turbine trip soleniods, 20 AST and 20 ASB. When these valves open, the turbine hydraulic oil system is dumped. Pressure switches 63/AST2, 63AST3, and 63AST sense the sudden loss of hydraulic oil pressure and trip the turbine, which in turn trips the reactor. The switches are calibrated at every refueling outage.

The licensee has reviewed the test results from the last six refueling cycles. In all but one of the tests, the trip point was more conservative than that specified in the test procedure. That is, the "as found" pressure trip point was higher than the specified level, which would have generated a trip signal sooner than the design requirements. Engineering analysis of the trip points indicated that the trip would have occurred approximately 0.01 second sooner than the design point. In one case, the trip point was in the less-conservative direction. Engineering review and analysis of this condition indicated that the turbine trip would have been delayed by approximately 0.01 second. It was concluded that this time delay would not result in any

significant deviation of safety-related equipment. The pressure switches associated with the low turbine auto stop oil pressure system are reliable devices. Since these devices are a "go/no-go" type of device rather than an analog sensor and they are not used in the safety analysis as a primary trip for accident mitigation, a one-time extension of 7 months for the surveillance test interval would not degrade the reliability of the system and is, therefore, acceptable.

2.4 Acoustic Monitors

The proposed change to TS Table 4.1-1, Item 34, Safety Valve Position Indicator (Acoustic Monitor), is a one-time extension of the surveillance interval for the functional test of the acoustic monitors, located inside the containment.

Power operated relief valves and code safety valves are provided to protect against pressure that is beyond the pressure-limiting capacity of the pressurizer spray. Acoustic sensors installed on the code safety valves discharge lines provide indication in the control room of the "flow" or "no flow" condition of the safety valves. These detectors are static devices with proven reliability. The test data reviewed that was from more than six test cycles supported this conclusion. Also, if a detector were to fail, it would not affect the proper operation of the code safety valves. Therefore, the extension of 7 months for the test interval of the acoustic monitors is acceptable.

2.5 PT-R5A Setting of Pressurizer Safety Valves

The proposed change to TS Table 4.1-3, Item 3, Pressurizer Safety Valves, is a one-time 4-month extension of the surveillance interval for the functional test of two of the three pressurizer safety valves (PSV) (PCV-466 and PCV468). The American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) requires testing of Class 1 pressure relief devices every 5 years. The TSs require a test for each device at each refueling interval. The licensee has reviewed its test results of the two PSVs from the last eight refueling outages. These tests spanned a period in excess of 13 years. Accordingly, of the 16 tests performed, there were seven values outside the TS 1 percent range and two values outside the ASME Section XI 3 percent range. Of the values that were out of range it was determined that the values were within the acceptance range, statistically insignificant with respect to major setpoint errors, and not an impact on any previously evaluated accident.

The licensee's proposed TS test frequency meets ASME Code test requirements. Compliance with the ASME Code test frequency provides an acceptable level of quality and safety and ensures operational readiness of the valves. Based on this and a review of the licensee's operating experience with the plant valves and general industry experience with similar valves, significant additional degradation of these components would not be expected during the proposed additional 4-month period. Therefore, the staff concludes that it is acceptable to revise TS Table 4.1-3, Item 3 to perform the testing of the installed plant PSVs with a maximum extension of 4 months and not beyond the refueling outage scheduled to commence no later than June 3, 2000.

2.6 PT-R6 Main Steam Safety Valves Setpoint Determination

The proposed change to TS Table 4.1-3, Item 4, Main Steam Safety Valve, is a one-time 5-month extension of the surveillance test interval for the functional test of 9 of the 20 main steam safety valves. Reactor shutdown from power requires removal of core decay heat. Immediate decay heat removal requirements are normally satisfied by steam bypass to the condensers. Therefore, core decay heat can be continuously dissipated via the steam bypass to the condenser as feedwater in the steam generator is converted to steam by heat absorption. Normally, the capability to feed the steam generators is provided by operation of the turbine cycle feedwater system.

If the condenser heat sink is not available during a turbine trip, excess steam, generated as a result of reactor coolant system sensible heat and core decay heat, is discharged to the atmosphere. One means of discharging the excess steam is through the main steam line code safety valves. There are five code safety valves located on each of the four main steam lines outside the reactor containment upstream of the isolation and non-return valves. Discharge from each of the twenty safety valves is carried to the atmosphere through individual vent stacks. Startup and/or power operation is allowed with main steam safety valves (MSSV) inoperable within the limitations of TSs. The maximum relieving capacity is associated with a turbine trip from 100 percent Rated Thermal Power coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser). Operability of the safety valves is verified each refueling shutdown.

The licensee has reviewed the 60 surveillance test results from the two 24-month refueling intervals. There were a total of eight failures. Three of the failures were in the conservative direction and can be considered not significant. The other five setpoints out of sixty tests were not conservative. Of these, two lifted at a pressure lower than the upper limit of the two highest set of values and all five were more than 200 psig below the normal hydrostatic test pressure for the steam generators. All valves, therefore, would have provided protection and allowed for removal of excess heat.

The ASME Code requires testing of Class 2 pressure relief devices every 10 years. The licensee's proposed TS test frequency meets ASME Code test requirements. Compliance with the ASME Code test frequency provides an acceptable level of quality and safety and ensures operational readiness of the valves. Based on this and a review of the licensee's operating experience with the plant valves and general industry experience with similar valves, significant additional degradation of these components would not be expected during the proposed additional 5-month period. Therefore, the staff concludes that it is acceptable to revise TS Table 4.1-3, Item 4 to perform the testing of the installed plant MSSVs with a maximum extension of 5 months and not beyond the refueling outage scheduled to commence no later than June 3, 2000.

2.7 Safety Injection System

The proposed change to TS Table 4.1-3, Item 5, Safety Injection System, is a one-time extension of the surveillance test interval for the functional tests specified in three sections: 4.5.A.1, 4.5.B.1, and 4.5.E.4.b. TS 4.1 Table 4.1-3, Item 5 requires the performance of an automatic actuation of the containment isolation system each refueling interval. TS 4.5.A.1 requires that the safety injection system test be performed at each reactor refueling interval.

TS 4.5.B.1 requires that the containment spray system be tested at each refueling interval. TS 4.5.E.4.b requires verification that the control room air filtration system automatically switches into recirculation mode of operation upon a safety injection test signal or a high radiation signal at least once every refueling interval. All of these requirements are demonstrated by performing surveillance PT-R13 for the safety injection system.

The safety injection system tests involves several plant systems. All anomalies are documented and placed in three categories. The first category concerns indication; the second is equipment being unavailable for testing because it was out of service for maintenance; and the third was for all others. The results from the last three refueling outages were reviewed and a number of problem areas were documented in each test. However, the results did not impact the ability of the safety injection system to perform its intended safety functions. Further none of the anomalies were determined to be time dependent. Therefore, the staff concludes that it is acceptable to revise TS 4.1 Table 4.1-3, Item 5, 4.5.A.1, 4.5.B.1, and 4.5.E.4.b to extend the surveillance interval to perform PT-R13, Safety Injection System, by 7 months to coincide with the refueling outage scheduled to commence no later than June 3, 2000.

2.8 Sensitive Leak Rate Test - Type "B"

The proposed change would revise Section 4.4.B to allow a one-time extension of the surveillance interval for the functional test of the Sensitive Leak Rate Test - Type "B". TS 4.4.B requires the sensitive leakage rate test be conducted such that containment penetrations, weld channels, and certain double-gasketed seals and isolation valve interspaces are pressurized to a minimum of 52 psig. The containment is maintained at atmospheric pressure during the test. The test criterion is total leakage less than or equal to 0.2 percent of the containment free volume per day (15.2 SCFM).

Surveillance test PT-R11, Sensitive Leak Rate Test - Type "B", is performed to evaluate leakage. The results from the last five refueling intervals tests were reviewed. All the test met the leakage requirements. The test was performed on an 18-month outage frequency prior to 1993 and was subsequently changed to a 24-month frequency. The licensee's evaluation of the last five tests show no apparent leakage trend which would indicate a worsening condition over time. Therefore, the staff concludes that it is acceptable to revise TS 4.4.B to extend the surveillance interval to perform PT-R11, Sensitive Leak Rate Test - Type "B", by 6 months to coincide with the refueling outage scheduled to commence no later than June 3, 2000.

2.9 Isolation Valve Seal Water System Functional Test

The proposed change would revise Section 4.4.D.1.c to allow a one-time extension of the surveillance interval for the functional test of the Isolation Valve Seal Water System (IVSW). The IVSW system helps to ensure the sealing effectiveness of containment isolation valves (CIV) that are located in lines connected to the reactor coolant system or that could be exposed to the containment atmosphere during any condition that requires containment isolation. This is accomplished by injection of a water or gas seal between valves or between the discs of double-disc gate valves.

The results from PT-R26, Isolation Valve Seal Water System Functional test, were reviewed for the last five refueling intervals. The 1993 and 1995 tests failed to meet the requirement. The

test performed in 1993 was not successful due to leakage from two of the 62 CIVs. These valves were subsequently repaired and did not contribute to any subsequent failure of PT-R26. The 1995 test was not successful because of leakage from five CIVs. These valves were also repaired and did not contribute to any subsequent failure of PT-R26. In 1997, PT-R26 was performed and the acceptance criteria was met.

In evaluating the five tests, there was no trend established between test failure and a particular valve. The licensee's evaluation of the last five test provides no indication that the length of time between tests has any impact on the success or failure of PT-R26. Therefore, the staff concludes that it is acceptable to revise TS 4.4.D.1.c to extend the surveillance interval to perform PT-R26, Isolation Valve Seal Water System Functional test, by 6 months to coincide with the refueling outage scheduled to commence no later than June 3, 2000.

2.10 Internal Containment Structural Visual Inspection

The proposed change would revise TS Section 4.4.G to allow a one-time extension of the surveillance interval for the Internal Containment Structural Visual Inspection. The reactor containment structure is a reinforced concrete vertical right cylinder with a flat base and a hemispherical dome. A welded steel liner with a minimum thickness of 0.25 inch is attached to the inside face of the concrete shell to ensure a high degree of leak tightness. The design objective of the containment is to contain all the radioactive material, which might be released from the core following a loss-of-coolant accident. The structure also serves as a biological shield and a pressure container.

Visual inspection of the accessible interior surfaces of the containment and its components is performed at each refueling outage and prior to any integrated leak rate test. Surveillances are conducted to ensure that degradation is detected and repaired long before it becomes significant or affects the containment structural integrity or leak tightness. The licensee evaluated inspection results from the last six surveillance tests. The 1989 and 1992 inspections yielded no deficiencies, however, the 1991, 1993, 1995 and 1997 inspections revealed deficiencies in the containment insulation liner. The purpose of the insulation is to limit the temperature rise in the liner accident. Therefore, the licensee concluded that the observed deficiencies were not significant, and did not affect any components that could impact the long-term containment structural integrity. Further, there was no apparent trend in the observed conditions that would indicate a worsening condition over time. Therefore, the staff concludes that it is acceptable to revise TS 4.4.G to extend the surveillance interval to perform PI-R2,Internal Containment Structural Visual Inspection, by 6 months to coincide with the refueling outage scheduled to commence no later than June 3, 2000.

2.11 Leak Rate Determination

The proposed change would revised TS Section 4.4.H.1.a.(2) to allow a one-time extension of the surveillance interval for the functional test for the leak rate determination for the piping and components. TS 4.4.H.1.a.(2) specifies the requirements for performance of a hydrostatic test of a selected portion of the Residual Heat Removal (RHR) piping system. PT-R27A is the surveillance procedure used to hydrostatically test the RHR piping from the pump suctions to the containment isolation valves on the containment sump line. The licensee reviewed test date for PT-R27A from 1986 through 1997. There was no leakage detected. The licensee's test results have not indicated leakage during the past seven outages, therefore, the staff concludes

that revising TS 4.4.H.1.a.(2) to extend the surveillance interval by 8 months should not result in increased leakage. Thus the proposed change is acceptable.

2.12 Hydrogen Recombiners

The proposed change would revise TS Section 4.5.C.1 to allow a one-time extension of the surveillance interval for the functional test of the Hydrogen Recombiners. The hydrogen recombiner system is located inside containment for post accident hydrogen control. Each recombiner is capable of maintaining the ambient hydrogen concentration at or below two volume percent. PT-R15, Hydrogen Recombiners, is the functional test performed to determine operability of the recombiners. The licensee reviewed the test data from the surveillance tests conducted in 1993, 1995, and 1997. In all instances the operability criteria were met. In addition to the complete recombiner system test being performed each refueling outage, a fan test is performed every two months and a control system test is performed quarterly to provide additional assurance of system operability. The licensee's review of surveillance test for the last year revealed no instances where the operability criteria was not met. Based on the past test results the staff concludes that extending the surveillance interval by 6 months should not have an affect on the test results. Therefore, the proposed change to TS 4.5.C.1 is acceptable.

2.13 Emergency Diesel Generator Load Test

The proposed change to revise TS Section 4.6.A.2 would allow a one-time extension of the surveillance interval for the functional test of the Emergency Diesel Generators. There are three emergency diesel generators (EDGs) in Indian Point 2. The purpose of this test is to demonstrate that the EDGs will carry full load rating in accordance with the TSs.

Each EDG is tested for 1750 kW (continuous) for 21.5 hours, 2100 kW for 2 hours and 2300 kW for 0.5 hour. The diesel performance tests are conducted while the unit is in the cold shutdown condition and cannot be done on line because the tests require an abnormal electrical system lineup (e.g., racking in 480 V ac-tiebreakers). A review of the historical EDG load tests data shows only two failures, however, none of these were due to EDG performance failure. Since this test cannot be done on line and no historical performance failures of EDGs were found during the tests, the proposed one-time extension TS 4.6.A.2 by 6 months is acceptable.

2.14 Safety Injection System Electrical Load Test

The proposed change would revise TS Section 4.6.A.2 and 4.6.A.3 to allow a one-time extension of test surveillance interval for the functional test of the Safety Injection System Electrical Load Test. The purpose of the test is to assure that each diesel generator will automatically start and assume the required load within 60 seconds after the initial start signal. This is accomplished by simulating a loss of normal AC station service power supplies and simultaneously simulating a Safety Injection Signal, verifying that the EDGs auto start, shed the required bus load and restore operation of particular vital equipment.

The diesel performance tests are conducted while the unit is in the cold shutdown condition and cannot be done on line because the test requires initiating a safety injection signal. A review of the historical EDG load tests data shows several anomalies in 1995, however, none of these were due to EDG performance failure, and they were not repeated during the 1997 test. Since

this test cannot be done on line and no historical performance failures of EDGs were found during the tests, the proposed one-time extension TS 4.6.A.2 and 4.6.A.3 by 7 months is acceptable.

2.15 Station Batteries

The proposed change would revise TS section 4.6.C.4 to allow a one-time extension of the test interval for the functional test of the station batteries. The purpose of the test is to determine the capacity of battery banks and periodically cycle the cells (discharge/charge). During the test, the batteries are discharged through a load bank with test parameters controlled by computer. The discharge rate follows (envelopes) the load profile. This test is a modified performance capacity test that meets or exceeds the requirements of IEEE-450. The results are satisfactory if the capacity is greater than or equal to 90 percent and the voltage is adequate (average cell and total).

The licensee evaluated the results of previous battery tests to review if the batteries would retain their capacity over an extended operating cycle of 36 months. There were no failures observed and no failure modes were found that are time dependent and that would preclude extending the operating cycle.

Since this test cannot be done on line and no historical performance failures of batteries were found during the tests, the proposed one-time extension of TS 4.6.C.4 by 7 months is acceptable.

2.16 Snubbers

The proposed change would modify TS Section 4.12 to allow a one-time extension of the surveillance interval for the functional test of the Snubbers. The snubbers prevent unrestrained pipe motion under dynamic loads, such as those caused by earthquakes or severe dynamic transients, while allowing normal thermal motion. The periodic tests assure that the snubbers will function properly when needed. IP2 uses a 10 percent sample plan to test snubbers currently installed in the plant. If any of the snubbers removed for testing fails the acceptance criteria, the procedure specifies that an additional 10 percent sample must be removed and tested. Testing normally continues until no more failures are found or until all of the snubbers are tested. The nature of the test plan is independent of the test interval initiating the inspections and, accordingly, is not impacted by the extended interval.

A review of the past test data indicated that snubber surveillance failure rates are low. Prior to 1991, visual inspections were performed on a refueling outage basis. IP2 was shut down for extended periods of time during the current fuel cycle and the refueling outage schedules are no longer synchronous with the 24-month surveillance requirements for snubbers in the plant TS. On the basis of the evaluation performed by the licensee, which concluded that the proposed revision to the TS surveillance requirements does not involve a 10 CFR 50.59 unreviewed safety question, the staff concludes that the expected snubber performance for the current operating cycle would be comparable to that which would be seen during the maximum currently allowed TS surveillance interval. Therefore, the proposed change to TS 4.12 to allow surveillance interval extension of 7 months is acceptable

3.0 CONCLUSION

The proposed amendment will allow a one-time extension of the functional tests described in Section 2.0 above. The method used by the licensee to evaluate the impact of the proposed functional test extension has been approved by the staff in the past. The proposed amendment does not make functional or physical changes to any equipment and does not adversely affect the plant's ALARA Program, Security and Fire Protection Program, Emergency Plan, Safety Evaluation Report (SER) or Updated SER conclusions and Overall Plant operations and environment. Also, the proposed amendment does not introduce any new failure modes nor does it involve a significant reduction in a margin of safety. Therefore, the staff approves the proposed one-time functional test extensions.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

The licensee states that exigent circumstances pursuant to 10 CFR 50.91 exist with respect to the need for consideration of the proposed amendment. The proposed increase in the surveillance intervals is requested due to an outage during 1998 which extended the operating cycle of the core, therefore, the next refueling outage is now scheduled to commence in June 2000. Without the one-time extension, an otherwise unnecessary plant outage would be required to perform these surveillances.

Based on the above, the NRC staff has determined that the licensee has used best efforts to make a timely application and that exigent circumstance are present which warrant processing the requested amendment pursuant to 10 CFR 50.91(a)(6).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided standards for determining whether a significant hazards consideration exits (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in a margin of safety.

The following evaluation, by the licensee and with which we agree, demonstrates that the proposed amendment does not involve a significant hazards consideration.

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendments:

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

(A) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The surveillance tests monitors the external leakage of selected systems outside containment that could contain highly radioactive fluids following an accident or serious transient. The results of 15 tests indicated that there was

no external leakage. Since the past test data supports the integrity of the systems, there is reasonable expectation that the piping systems will continue to perform its intended safety function without external leakage.

It is concluded that a one-time extension of seven months for the leak test surveillance interval will have minimal impact.

(B) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The high reliability of the circuit logic, and the fact that this reliability appeared not to be time dependent, leads to the conclusion that an extension of the surveillance interval of seven months should not impact the ability of the circuit to perform its safety function.

(C) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. No credit is taken for a reactor trip from a low turbine auto stop oil pressure signal resulting from a turbine trip. In addition, no credit is taken for this system for turbine missile protection. Therefore, increasing the surveillance interval for this parameter has no impact upon the probability or consequences of an accident.

It is concluded, that a one-time extension of 7 months for the channel calibration surveillance interval for the Low Turbine Auto Stop Oil Pressure system will have minimal risk impact.

(D) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The acoustic monitors are not required to operate in response to an accident but only provide indication in the CCR (central control room) that there is flow in the safety valve discharge lines. A failure of a detector would not affect the ability of the safety valves to perform their required safety function.

(E) There is no significant increase in the probability or consequences of an accident which can be attributed to a four month extension in testing two of the three safety valves. In no case was the bounding analysis exceeded for the "As Found" criteria and for all cases the maximum margin available is provided by requiring the valve setpoint meet the most conservative +/- 1 percent criteria for the "As-Left" setpoint.

(F) There is no significant increase in the probability or consequences of an accident. The accident analysis conservatively assumes that neither the condenser nor the atmospheric steam dumps are operable. As noted previously, other means of steam dumping in addition to the steam generator safeties will most likely be available. In addition, of the sixty tests reviewed, only five "As Found" settings were high. A high setting does not mean loss of function as they would have provided protection, but at a higher setpoint.

(G) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

An assessment has been performed of the test results from the last three refueling outages, covering a period in excess of six years. Significant anomalies were evaluated as discussed in the preceding test result section. After corrective action, these events were not repeated in subsequent system tests. In all instances, the problems were not identified to be time dependent. Thus, it is concluded that extending the surveillance interval by seven months will

not involve a significant increase in the probability or consequences of an accident previously evaluated.

(H) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The accident analysis does not credit the operation of the WCP (weld channel penetration) system. The system has demonstrated reliability and performance such that there is confidence that the consequences of an accident will be limited.

The one (out of five) test problems can be attributed to individual components within the population and the problems with these components were resolved and found not to be recurring. No link between the period of time between tests and test failures was established.

(I) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. As stated above in the evaluation of change for the isolation valve seal water system, the accident analysis does not take credit for the operation of the IVSW (isolation valve seal water) system. The system has demonstrated reliability and performance such that there is confidence that the consequences of an accident will be limited.

The two (out of five) test failures can be traced to individual components within the population and the problems with these components were found not to be recurring. No link between the period of time between tests and test failures was established.

(J) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Minor observations were identified on some of the inspections reviewed and mostly concerned surface imperfections and minor cosmetic items. The engineering and operation review of the findings indicated that the deficiencies were not expected to impact any plant function. In many cases the deficiencies to the liner insulation and the flashing appeared to be a result of human performance or work practices. In no case was there any direct damage to the containment structure that could cause any structural degradation or affect the leak tightness. In no instances were the observations of a nature that, if left unattended, had the potential to compromise structural or leakage integrity. None of the observed deficiencies appeared to be time dependent and therefore an extension of the surveillance interval of six months should not impact the ability of the containment structure to perform its safety function.

(K) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Extending the surveillance interval for eight months will, in all likelihood, only extend the period that the RHR system is not in service. Mechanisms that may induce leakage are more likely to develop when the system is in operation rather that during an extended standby period. Since the past test data supports the integrity of the system and an extended standby period is not expected to affect any potential

leak path, there is a reasonable expectation that the RHR system will continue to perform its intended safety function without excessive leakage.

(L) The proposed license amendment does no involve a significant increase in the probability or consequences of an accident previously evaluated. Past test data indicate that the recombiners are highly reliable. Absent an emergency, the recombiners are in a standby condition, except for routine testing, with no operational stresses. Extension of the surveillance interval would only lengthen the time spent at standby. Based on reliability, minimal operating time and successful test results, an extension of six months should not impact of the system to perform its intended safety function.

(M)The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The historical data demonstrates that the engines have consistently met the required performance criteria. The identified anomalies with valve and filter operation were evaluated and corrected and are not indicative of any inability of the machine to meet performance requirements.

(N) The proposed license amendment does not involve a significant increase in the probability or consequence of an accident previously evaluated. The test procedure under consideration is one of the more complicated surveillance procedures accomplished at refueling intervals. Considering the vast number of components that are tested, it is highly improbable that some deficiencies will not occur. When such problems are encountered it is important to note whether the corrective maintenance implemented prevents recurrences in the future.

In consideration of the evaluation of past test observations, it is important to note that the problems which occurred were not time dependent and that maintenance and testing practices have been effective in precluding future failures of the same type. Equally important is whether the emergency power system would have performed its intended safety function if the situation was not a test but represented an actual demand upon the system. Test acceptance criteria are always more stringent than required by accident scenarios to provide margin. As discussed previously, a condition existed where the manual start of the Train "A" and Train "B" containment spray pumps was precluded by a single malfunctioning relay. Capability of manually starting the pumps was still available but this manual capability required removing the containment spray signal from the breakers prior to operating the manual control switches. An automatic safety injection would have provided for a sequenced start of the pumps with a containment spray signal. However, a postulated single failure of an automatic safety injection relay could have precluded the starting of both pumps in a similar manner. Except for the Train "A" containment spray pump, the malfunctioning Train "B" relay only affected Train "B" components.

In summary, it is concluded that extending the surveillance interval will not involve a significant increase in the probability or consequences of an accident previously evaluated. The problems encountered in the test conducted during the 1995 refueling outage were not time dependent and did not recur during the test done in the 1997 refueling outage.

(O) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Review of data indicates no failures in discharge capacity. In addition, the Technical Specifications require on a monthly basis,

measurement of the voltage of each battery. Similarly on a quarterly basis, additional testing on each battery is performed. Data comparisons are made to determine possible degradation.

Successful past data indicates that the batteries have additional life. This factor, together with the existing monthly and quarterly testing, will provide assurance that there will be no increase in the probability or consequences of an accident previously evaluated by extending the surveillance interval.

(P)The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The results of the visual inspection over the period from 1989 to 1998 indicate that all of the snubbers were found to be acceptable. Any discrepant conditions found during the inspection were remedied either by repair or replacement of the snubber.

All snubbers passed an "As Left" visual inspection (including the replacement snubber installed in place for those removed for functional testing) that assures that the snubber meet the original design configuration prior to returning the snubber to service.

The Technical Specification functional testing program requires a sampling program that provides a 95% confidence level that 90-100% of the snubbers operate within acceptance limits. For each snubber failing the functional test an additional sample lot must be selected and tested to assure that the required confidence level is maintained.

Based upon the historical data, it is concluded that an extension of the visual inspection interval of four months and the functional test interval of seven months will have minimal risk impact.

2. Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated.

(A) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The integrity of the specific systems associated with the tests should not be affected by an extended surveillance period for the reasons described in (A) above. The test results showed that there were no external leakage paths outside containment that would allow radioactive fluids to escape the systems.

The three identified test failures were not related to external leakage and external leak probability would not be affected by an extended test interval. Therefore, it is anticipated that the portion of the piping system evaluated by the subject tests will continue to perform its intended function.

(B) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Based on the analysis of the surveillance data, it is concluded that the logic for this circuit would continue to perform its intended safety function over long

operating cycles and therefore, the possibility of a new or different accident has not been created.

(C) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval will not add any new failure modes.

Since no credit is taken in the safety analysis for this trip, the possibility of a new or different kind of accident has not been created by extending the surveillance interval.

(D) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The devices are static and are in a standby condition during normal operation. Thus, the amount of service induced stress is minimized. Under these circumstances it is expected that the monitors would perform acceptably over an operating cycle extended by six months.

(E) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, there is no evidence from the data that indicate that a one-time increase of the surveillance interval for two of the three safety valves will adversely affect the setpoint.

(F) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report.

Also, the increased surveillance interval (one-time only) will not adversely affect the Main Steam Safety Valve setpoint evidenced by the comparison of data from the two five year periods.

(G) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) extension will not adversely affect the Safety Injection System as evidenced by the comparison of results from the past three surveillance tests.

(H) The proposed license amendment does ot create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of

any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the results of the Sensitive Leak Rate test.

(I) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the results of the overall Isolation Valve Seal Water System test as evaluated in the description of change.

(J) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a. manner that is different from that addressed in the Updated Final Safety Analysis Report. It is concluded that the containment building would continue to perform its intended safety function over long operating cycles and therefore, the possibility of a new or different accident has not been created.

(K) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The integrity and performance of the RHR system is not expected to be influenced by an extended surveillance period for the reason addressed in item (1)(K) above. Therefore, it is anticipated that the portion of the RHR system reviewed herein will continue to perform its intended function and that leakage will not exceed levels previously analyzed for radiological releases.

(L) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report.

(M) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the emergency diesel generators.

The functional test history indicates the two functional test failures were the result of actions independent of actual EDG (emergency diesel generator) load performance. Apart from these anomalous actions, the record does not indicate a potential for failure to meet performance

criteria. In both cases, the functional test failures were thoroughly analyzed. Appropriate actions were taken to prevent recurrence. Subsequent testing resulted in the emergency diesel generator meeting its design requirements.

(N) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the Safety Injection System and its emergency power supply to perform its intended safety function.

The effectiveness of maintenance practices, both preventive and corrective and change in test technique has been proven in that deficiencies noted in one test were not repeated in the subsequent test. The last refueling surveillance test was successful and no new test failures were noted. Because past test deficiencies do not appear to be time dependent, extending the surveillance interval by seven months is not expected to create the possibility of a new or different kind of accident from any accident previously evaluated.

(O) The proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the safety function of the batteries.

(P) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the snubbers.

The past visual and functional test history with no visual inspection failures and very few functional test failures (three) provides assurance that an extension in the surveillance will not rest It in increased snubber failures.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

(A) The proposed license amendment does not involve a significant reduction in a margin of safety. Review of historical test data provides assurance that the systems would continue to perform their intended safety function. The proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. There is minimal risk that a surveillance extension of seven months will increase external leakage from the piping system under review beyond the license requirements or that the system performance will be influenced. It is concluded that a surveillance extension of seven months should not impact the margin of safety.

(B) The proposed license amendment does not involve a significant reduction in a margin of safety. There were no deficiencies noted for the surveillance tests reviewed. The proposed one-time extension of the surveillance test interval will not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past results, the one-time extension of seven months does not involve a significant reduction in a margin of safety.

(C) The proposed license amendment does not involve a significant reduction in a margin of safety. The proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of seven months does not involve a significant reduction in a margin of safety.

(D) The proposed license amendment does no involve a significant reduction in a margin of safety. The monitors have demonstrated reliability and during normal operation do not function. Under these circumstances there is expected to be minimal impact upon safety by extending the operating cycle by six months. The proposed change for a one time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of six months does not involve significant reduction in a margin of safety.

(E) A significant reduction in the margin of safety is not anticipated based on evaluation of the data. Historical data and the 1997 Justification of Past Operation provide assurance that the safety valves would perform their intended safety function. These facts, together with alternate means of over pressure protection (such as power operated relief valves), minimize any significant reduction in the margin of safety. The aggressive Technical Specification test frequency provides an added level of assurance with respect to setpoint maintenance. Based on analysis of the surveillance data, the one-time extension of four months for two of the three safety valves does not involve a significant reduction in a margin of safety.

(F) A reduction in the margin of safety is no anticipated based on evaluation of the data. Historical data provides confidence that all of the safeties would continue to perform their intended function. Only nine of the twenty safety valves will be subject to the five-month

extension. These facts, together with alternate means of heat rejection that will most likely remain available, minimize any potential reduction in the margin of safety.

(G) The proposed amendment does not involve a significant reduction in a margin of safety. The results of the previous three cycles of test data have been evaluated. None of the anomalies observed were sufficiently serious to impact the performance of the Safety Injection System or to weigh against a one-time extension of seven months to the current surveillance interval. The replacement of the Master Relays with those of a type that can be tested online has enhanced the confidence in system reliability. Therefore, it is concluded that this, one-time extension request will not involve a significant reduction in the margin of safety.

(H) A reduction in the margin of safety is not anticipated based on evaluation of the data. The accident analysis does not credit the operation of the WCP (weld channel penetration) system. Historical data provides confidence that the system will perform as required and that root problems can be eliminated such that they do not cause repeat failures of the same components. The system will continue to be adequately monitored and tested; therefore, an extension of six months will have minimal impact on the margin of safety.

(I) The proposed license amendment does not involve a significant reduction in a margin of safety. Historical data provides confidence that the system will perform as required and that root problems can be eliminated such that they do not cause repeat failures of the same components. The system will continue to be adequately monitored and tested; therefore, an extension of six months will have minimal impact on the margin of safety.

(J) The proposed license amendment does not involve a significant reduction in a margin of safety. The nature of the deficiencies observed during the surveillances has not been significant with respect to the structural integrity and containment leakage. The proposed one-time extension of the surveillance test interval will not adversely affect the performance of any safety related system, component or structure and does not result in increase severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of six months does not involve a significant reduction in a margin of safety.

(K) The proposed license amendment does not involve a significant reduction in the margin of safety. There is minimal risk that a surveillance interval extension of eight months will increase leakage in the piping system under review beyond the Technical Specification limits or that the system performance will be influenced. Past test data indicates that there was no impact on the margin imposed by the Technical Specification.

(L) The proposed license amendment does not involve a significant reduction in a margin of safety.

The proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increase severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of six months does not involve a significant reduction in a margin of safety. Online testing is performed periodically on the fans and controls providing additional assurance that the Hydrogen Recombiner System will perform its intended safety function.

(M) The proposed license amendment does not involve a significant reduction in a margin of safety. There is no reduction of margin indicated by the surveillance testing. The proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increase severity of any of the accidents considered in the Updated Final Safety Analysis Report. Surveillance test results indicate no trend toward margin reduction.

Based on past rest results, the one-time extension of six months does not involve a significant reduction in a margin of safety.

(N) The proposed license amendment does not involve a significant reduction in a margin of safety. Because previous test indicate that the engineered safety features emergency power supply would have performed its intended safety function if called upon, it is concluded that the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of seven months does not involve a significant reduction in a margin of safety.

(O) The proposed amendment does not involve a significant reduction in a margin of safety. Extension of the surveillance cycle will have minimal impact upon the margin of safety.

Periodic surveillance tests will indicate deficiencies at a state where they are unlikely to influence battery capacity permitting corrective action prior to degradation to an unacceptable state.

(P) The purpose of the functional test is to provide a 95% confidence level that 90-100% of the snubbers operate within the specified acceptance limits. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability

The review of past inspection and test history indicates that this objective was met at the time of the inspection and testing. There are no identified trends that would suggest that the same success rate would not be maintained over the requested extension period. The proposed license amendment does not involve a significant reduction in a margin of safety. The proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of 4 months for the visual tests and seven months for the functional tests does not involve a significant reduction in a margin of safety.

6.0 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.

7.0 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 and changes surveillance requirements. 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. 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 made a final no significant hazards finding with respect to this amendment.

6.0 CONCLUSION

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.

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