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December 11, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247
NL 00-148

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

**SUBJECT: Indian Point 2 License Amendment Request - Revisions to the
Technical Specifications**

Transmitted herewith is an Application for Amendment to the Operating License. The application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit No. 2 (IP2) Technical Specifications (TS). These changes consist of editorial revisions, clarifications, and corrections to the existing Technical Specifications. These changes affect the TS Cover Page, Table of Contents, List of Figures, and TS Sections 4.5, 5.1, 6.2, 6.9, 6.15, and 6.16. The details of the proposed changes are provided in the attachments to this letter.

Attachment 1 to this letter provides the description and evaluation of the proposed changes. The revised TS pages are provided in Attachments 2 (strikeout/shadow format) and 3 (revision bar format).

The proposed TS changes provide revisions that do not require immediate implementation. However, Con Edison requests a timely review and that the proposed changes be approved by July 2001 with an effective date within 60 days of approval.

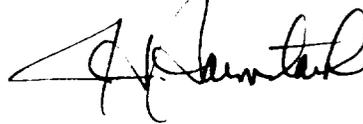
The Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) have reviewed the proposed changes. Both committees concur that the proposed changes do not represent a significant hazards consideration as defined by 10 CFR 50.92 (c).

A001

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

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

Very truly yours,

A handwritten signature in black ink, appearing to read "John F. McCann", written over a horizontal line.

Attachments

cc:

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSOLIDATED EDISON COMPANY) Docket No. 50-247
OF NEW YORK, INC.)
(Indian Point Station, Unit No. 2))

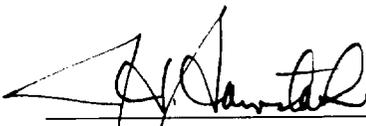
APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission (NRC), Consolidated Edison Company of New York, Inc. (Con Edison), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A of this license.

The specific proposed Technical Specification revisions are set forth in the attachments. The associated assessments demonstrate that the proposed changes do not represent a significant hazards consideration as defined in 10 CFR 50.92(c).

As required by 10 CFR 50.91(b)(1), a copy of this Application and our analysis concluding that the proposed changes do not constitute a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY:



James S. Baumstark
Vice President - Nuclear Engineering

Subscribed and sworn to
before me this 11th day
DECEMBER, 2000.


Notary Public

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

ATTACHMENT 1 TO NL 00-148

LICENSE AMENDMENT REQUEST

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

LICENSE AMENDMENT REQUEST

DESCRIPTION OF THE PROPOSED CHANGE

Consolidated Edison Company of New York, Inc. (Con Edison) is requesting a change to the Indian Point Unit No. 2 (IP2) Technical Specifications (TS) to provide editorial revisions, clarifications, and corrections to the existing TSs. The proposed changes to the TSs are described below.

A. Update of the TS Cover Page, Table of Contents, and List of Figures

This proposed change consists of editorial changes to the TSs to provide updated information and correct existing errors. The TS Cover Page is being revised to identify that the TSs are Appendix "A" to the Facility Operating License. Additionally, the Table of Contents, and List of Figures are being updated to reflect the correct sections, titles, and page numbers of the current TS. Additional editorial changes as shown in Attachment 2 are also included.

Additionally, various changes are made to the format and layout of these tables. Formatting changes to these pages are not shown as revisions (i.e., not marked with revision bars) if the existing wording was not modified.

B. Corrections and Clarifications for Control Room Air Filtration System Testing

This change proposes revisions to TS 4.5.E, "Control Room Air Filtration System," to remove an incorrect system description and provide consistent test values for system flow rate and filter efficiency. These changes were previously discussed in Reference 8. Specifically, these changes involve the following corrections.

1. TS 4.5.E.2.b is being deleted in its entirety. This test was added to the TS in error as part of TS Amendment No. 77. The specified test for bypass flow to the facility vent through the system diverting valves applies to ventilation systems that filter air being released to the atmosphere and does not apply to the control room air filtration system which filters air being discharged to the control room.
2. TS 4.5.E.4.c is being revised to include the system flow rate at which this specification applies. A system flow rate 2000 cfm $\pm 10\%$ will be specified. This will remove any ambiguity from the specification and provide consistency with the other specifications for the control room air filtration system.
3. TS 4.5.E.5 is being revised to require a filter bank efficiency of greater than or equal to 99.95% of DOP versus the current value of 99%. The value of 99.95% reflects the current test value and is conservative to the design basis value of 99%.

C. Revision of TS Figure 5.1-1B

This proposed revision corrects an error on TS Figure 5.1-1B concerning the indicated location of release points associated with Indian Point Unit 3 (IP3). The labels for the plant vent and the machine shop are reversed on this figure for IP3. The release points are shown correctly for Unit 2 on Figure 5.1-1A.

D. Revision of the Location of the Lines of Authority, Responsibility, and Communication

This proposed change consists of revising TS Section 6.2.1.a under "Facility Management and Technical Support," to reference the Quality Assurance Program Description (QAPD) as the location of the documentation for lines of authority, responsibility, and communication rather than the Updated Final Safety Analysis Report (UFSAR).

E. Deletion of Addressee for the Monthly Operating Report

This proposed change revises the recipient of the Monthly Operating Report listed in TS 6.9.1.7, "Monthly Operating Report," from the Director, Office of Resource Management to the NRC. The monthly operating report is submitted to the NRC in accordance with 10 CFR 50.4, "Written Communications."

F. Correction of the Title for the Radioactive Effluent Release Report

This proposed change corrects the reference to the Radioactive Effluent Release Report in TS Sections 6.15, "Offsite Dose Calculation Manual (ODCM)," and 6.16, "Major Changes to Radioactive Liquid, Gaseous and Solid Waste Systems," to delete "semiannual." The Radioactive Effluent Release Report was changed from semiannual to annual by Amendment No. 172; however, these sections were inadvertently not revised to show that change.

EVALUATION OF THE PROPOSED CHANGE

The proposed changes consist of editorial and administrative changes, clarifications, and corrections to the IP2 TSs. These changes do not involve physical changes to the plant, changes to the operation of plant systems, or changes that affect the plant safety analyses. Accordingly, these changes are considered to be minor in nature and are not safety significant. The details of each of these proposed changes is provided below:

A. Update of the TS Cover Page, Table of Contents, and List of Figures

The proposed changes to the TS Cover Page, Table of Contents, and list of Figures are administrative type changes and do not result in the change to any requirement contained in the TSs. The proposed changes update the cover page and listings to reflect the contents of the TSs.

Note that TS Figures 3.10-2, 3.10-3, 3.10-4, 3.10-5, and 3.10-6 are not currently listed in the List of Figures. Reference 6 has proposed deletion of these figures from the TSs.

Since these figures are in the process of being deleted from the TSs, they were not added to the List of Figures as part of this proposed change.

B. Corrections and Clarifications for Control Room Air Filtration System Testing

The proposed changes to TS 4.5.E, "Control Room Air Filtration System," provide clarification and corrections to the existing TSs. Three separate changes regarding testing of the control room air filtration system are proposed.

1. TS 4.5.E.2.b requires testing of "the total bypass flow of the system to the facility vent, including leakage through the system diverting valves." This requirement was added in error as part of Amendment No. 77 (Reference 3). Prior to Amendment No. 77, the requirements for the control room air filtration system were not included in the IP2 TSs.

As requested by the Atomic Energy Commission (AEC) in Reference 1, Con Edison submitted proposed TSs to add requirements for air filtration systems to the IP2 TSs in Reference 2. At that time, Con Edison proposed TSs that included requirements for both the control room air filtration system and the fuel storage building air filtration system. The proposed TSs for these two filtration systems were based on the Standard Technical Specifications in NUREG-0452 which included testing of the total bypass flow of the system to the facility vent (including leakage through the system diverting valves) for systems with diverting valves.

As stated in the Safety Evaluation for Amendment No. 77, discussions had been held between Con Edison and the NRC prior to the issuance of Amendment No. 77 regarding the fuel storage building air filtration system. It was determined that there were no diverting valves in the fuel storage building air filtration system and the dampers around the charcoal adsorber had been sealed. Therefore, SR 4.5.F.2.b which required testing of the total bypass flow for the fuel storage building air filtration system, as proposed, was not included in the approved TSs. However, the same requirement for the control room air filtration system was not discussed and the requirement remained in the approved TSs.

The control room air filtration system allows for filtration of the air flowing into the control room when required. This system does not provide flow to the facility vent. The requirement from NUREG-0452 applies only to systems that are designed to limit the release of radioactivity to the atmosphere. For those systems, upon initiation of the system, isolation valves close to allow air flow through the air treatment system before release to the plant vent. If the valves (diverting valves) do not close tightly, excessive bypass leakage could occur to negate the usefulness of the high efficiency particulate absolute (HEPA) filters and charcoal adsorbers to reduce potential radioiodine releases to the atmosphere. This arrangement does not apply to the control room air filtration system. As further indication, this requirement is not included in the current Standard Technical Specifications for Westinghouse Plants (NUREG-1431).

This proposed change does not modify the configuration of the control room air filtration system nor change the operation, design, or function of the system. The proposed change removes the requirement to perform testing on equipment that does not exist in the design of the system. Other testing of the HEPA filters as required by the TSs is not affected by this proposed change. This change was previously discussed in Reference 8.

2. The system flow rate of 2000 cfm \pm 10% is being added to the requirements of TS 4.5.E.4.c which requires verification that the control room air filtration system maintains the control room at positive pressure relative to the adjacent areas. This is the same value that is already included in TSs 4.5.E.2.a, 4.5.E.2.b, 4.5.E.2.c, 4.5.E.4.a, 4.5.E.5, and 4.5.E.6. This proposed change adds specific clarification to this TS and does not affect the system configuration or operation. This change was previously discussed in Reference 8.
3. The HEPA filter bank efficiency of the control room air filtration system in TS 4.5.E.5 is being revised to require a removal value of greater than or equal to 99.95% of the DOP. The proposed value is more conservative than currently provided in the Technical Specifications and is conservative to the value of 99% that is used in the corresponding radiological dose calculations. This value is consistent with Regulatory Position C.5.c of Regulatory Guide 1.52, Revision 2. The use of this more conservative value was previously discussed in Reference 8.

This proposed change does not modify the configuration of the control room air filtration system or the operation of this system. This change provides a more conservative value for the acceptance testing for the HEPA filter bank.

C. Revision of TS Figure 5.1-1B

This proposed change revises the IP3 portion of TS Figure 5.1-1B. Currently this figure has transposed labels for "Plant Vent - 265'EL" and "Machine Shop-90'EL" for the IP3 site. This change is administrative in nature as it applies to the information related to IP3. This change does not change any release point or locations in the actual plants, but merely corrects labeling on the figure for two points.

D. Revision of the Location of the Lines of Authority, Responsibility, and Communication

This proposed change revises the documentation location for lines of authority, responsibility, and communication as described in TS 6.2.1 from the Updated Final Safety Analysis Report (UFSAR) to the Quality Assurance Program Description (QAPD). The listed information was deleted from the IP2 TSs and moved to the UFSAR in Amendment No. 134 (Reference 4). This change was performed in accordance with Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," which allowed the organization charts to be moved from the TSs to the FSAR, Quality Assurance Plan, or other appropriate document.

The proposed change relocates this information from the UFSAR to the QAPD which is also an acceptable document listed in Generic Letter 88-06. Other administrative control requirements have been previously moved from the TSs to the QAPD by Amendment No. 206 (Reference 7) in accordance with Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." Changes to the QAPD are performed under the requirements of 10 CFR 50.54. This is an administrative change that allows Con Edison to centralize and control this type of information in the QAPD.

A similar request for IP1 has been submitted in Reference 9.

E. Deletion of Addressee for the Monthly Operating Report

This proposed change revises TS 6.9.1.7, "Monthly Operating Report," to indicate the recipient as the NRC rather than the Director, Office of Resource Management. This is an administrative change to the TS that does not change any of the content requirements or submittal timing/frequency requirements of the Monthly Operating Report. This change is consistent with 10 CFR 50.4, "Written Communications," which requires these reports to be submitted to the NRC Document Control Desk.

F. Correction of the Title for the Radioactive Effluent Release Report

This proposed change corrects the title for the Radioactive Effluent Release Report in TSs 6.15 and 6.16 by deleting the word "semiannual." The Radioactive Effluent Release Report (TS 6.9.1.5) was changed from semiannual to annual by Amendment No. 172. Amendment No. 172 revised several sections of the TSs to reflect this change; however, some sections were inadvertently not changed at that time. Changes to correct this omission in TS Sections 4.19, "Meteorological Monitoring System," and 6.14, "Process Control Program (PCP)," were submitted by Con Edison in Reference 6. Again, other sections of the TSs that required changes were inadvertently not included in that request. This license amendment request proposes changes to the remaining references to the Semiannual Radioactive Effluent Release Report in the TSs. These changes are administrative in nature to reflect the change previously approved in Amendment No. 172.

NO SIGNIFICANT HAZARDS CONSIDERATION

The proposed changes described above do not involve a significant hazards consideration. This conclusion is based on the evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

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

The proposed changes consist of editorial changes, administrative changes, clarifications, and corrections to existing TSs. These changes do not involve a change to the design or operation of any plant system nor are any of the safety analyses affected as a result of these changes. Accordingly, the initiators of any accident as well as any system relied

upon for the mitigation of an accident are not affected by the proposed changes. Therefore, there is no increase in the probability or in the consequences of an accident previously evaluated.

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

The proposed changes do not involve a change to the design or operation of any plant system. These changes include editorial changes, administrative changes, clarifications, and corrections of existing TSs and, therefore, do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes consist of editorial changes, administrative changes, and clarifications to existing TSs and do not involve changes to any margin of safety.

CONCLUSION

The proposed changes consist of editorial and administrative changes that correct errors and provide additional clarification. These changes do not involve physical changes to the plant, changes to the operation of plant systems, or changes that affect the plant safety analyses. Accordingly, these changes are considered to be minor in nature and do not involve a significant hazards consideration.

REFERENCES

1. AEC to Con Edison letter dated December 18, 1974, Request to Submit Amendment to Change the Technical Specifications Related to Installed Filter Systems
2. Con Edison letter to NRC dated August 4, 1980, Application for Amendment to Operating License
3. NRC to Con Edison letter dated May 14, 1982, Issuance of Amendment No. 77
4. NRC to Con Edison letter dated August 1, 1988, Issuance of Amendment No. 134
5. NRC to Con Edison letter dated July 21, 1994, "Issuance of Amendments for Indian Point Nuclear Generating Unit Nos. 1 and 2 (TAC Nos. M88040 and M88093)"
6. Con Edison to NRC letter dated February 14, 2000, "Proposed Technical Specification Amendment Consisting of Administrative Changes"
7. NRC to Con Edison letter dated February 25, 2000, "Indian Point Nuclear Generating Unit No. 2 - Re: Issuance of Amendment Allowing Relocation of Administrative Controls Related to the Quality Assurance Program Description (TAC No. MA5724)"
8. Con Edison to NRC letter dated April 6, 2000, "Testing of HEPA Filter Systems"

9. Con Edison letter to NRC dated October 5, 2000, "Proposed Technical Specification Amendment Consisting of Administrative Changes"
10. NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors"
11. NUREG-1431, "Standard Technical Specifications - Westinghouse Plants"
12. Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," March 22, 1988
13. NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," December 12, 1995
14. Regulatory Guide 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water Cooled Nuclear Power Plants," March 1978

ATTACHMENT 2 TO NL 00-148

**LICENSE AMENDMENT REQUEST
TECHNICAL SPECIFICATION PAGES IN
STRIKEOUT/SHADOW FORMAT**

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APPENDIX A

TO

FACILITY OPERATING LICENSE DPR-26

FOR

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING PLANT UNIT NO. 2

DOCKET NO. 50-247

TECHNICAL SPECIFICATIONS AND BASES

~~TECHNICAL SPECIFICATIONS~~
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E. CONTROL ROOM AIR FILTRATION SYSTEM

The control room air filtration system specified in Specification 3.3.H shall be demonstrated to be operable:

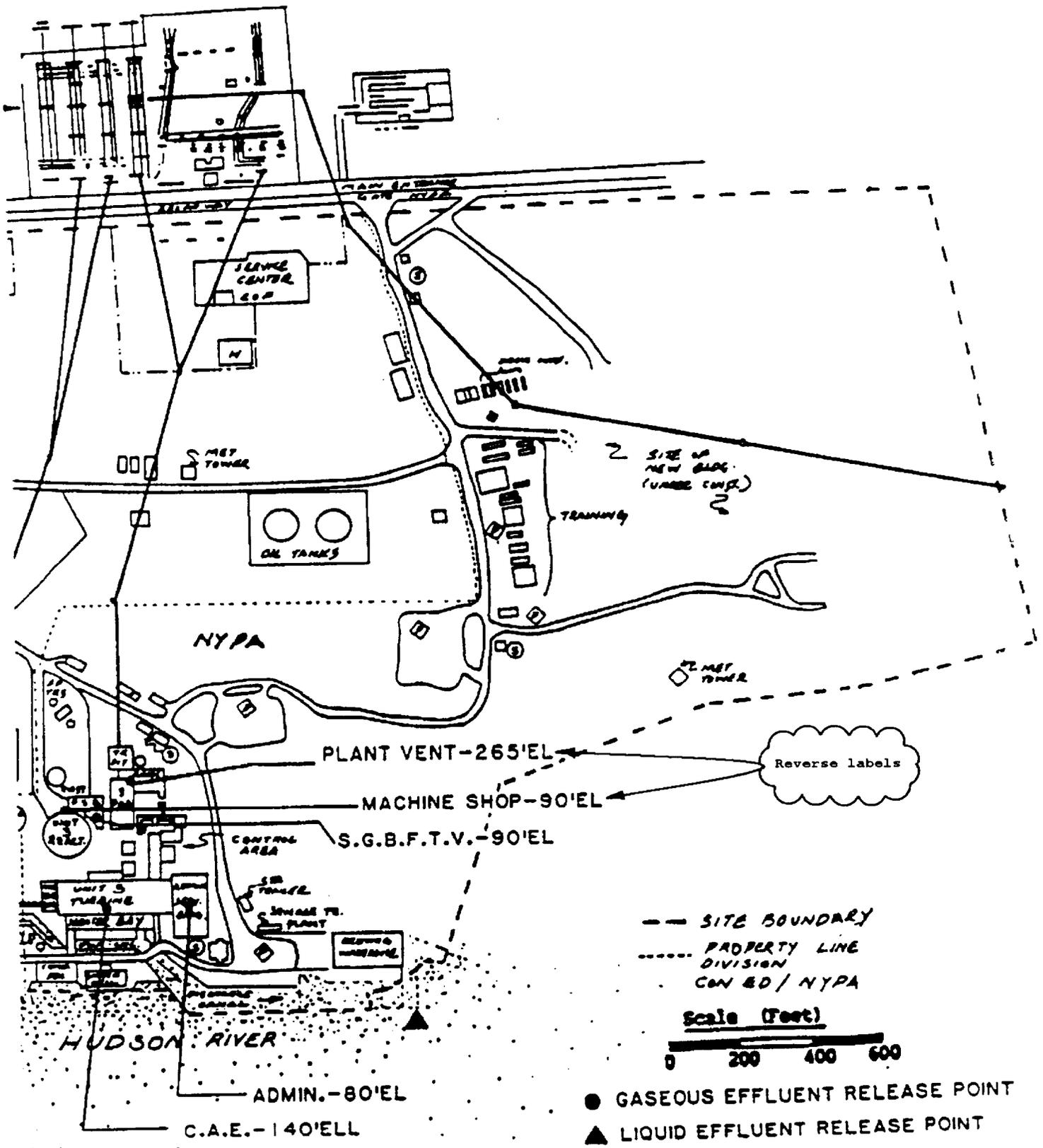
1. At least once monthly by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.
2. At least once every Refueling Interval(#) or (1) after any structural maintenance on the HEPA filter or charcoal adsorber 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 2000 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1975.
 - b. ~~verifying that, with the system operating at ambient conditions and at a flow rate of 2000 CFM \pm 10% and exhausting through the HEPA filters and charcoal adsorbers, the total bypass flow of the system to the facility vent, including leakage through the system diverting valves, is less than or equal to 1% when the system is tested by admitting cold DOP at the system intake. DELETED~~
 - c. verifying that the system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, at ambient conditions and at a flow rate of 2000 cfm \pm 10%.
 - d. verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1973, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

4. At least once every Refueling Interval(#) by:
 - a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 2000 cfm $\pm 10\%$.
 - b. verifying that, on a Safety Injection Test Signal or a high radiation signal in the control room, the system automatically switches to a filtered intake mode of operation with flow through the HEPA filters and charcoal adsorber banks. ¹
 - c. verifying that the system maintains the control room at positive pressure relative to the adjacent areas during ~~system operation~~ the pressurization mode of operation at a makeup flow rate of 2000 cfm $\pm 10\%$.
5. After each complete or partial replacement of an HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 2000 cfm $\pm 10\%$.
6. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 2000 cfm $\pm 10\%$.

F. FUEL STORAGE BUILDING AIR FILTRATION SYSTEM

The fuel storage building air filtration system specified in Specification 3.8 shall be demonstrated 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 system operates for at least 15 minutes.



MAP IS INTENDED SOLELY FOR THE PURPOSE OF IDENTIFYING LIQUID AND GASEOUS RELEASE POINT LOCATIONS AND ELEVATIONS. ELEVATIONS ARE FROM MEAN SEA LEVEL (MSL) SANDY HOOK, N.J.

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

FIGURE 5.1-1
 B

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President-Nuclear Power shall be responsible for overall facility activities and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Plant Manager shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the ~~Updated FSAR~~ **Quality Assurance Program Description (QAPD)**.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

- c. principal radionuclides (specify whether determined by measurement or estimate),
- d. source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to Unrestricted Areas of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Report shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 4.11.B.

MONTHLY OPERATING REPORT

- 6.9.1.7 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or pressurizer safety valves shall be submitted on a monthly basis to the ~~Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555~~, NRC no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT (COLR)

- 6.9.1.8 Core operating limits shall be established and documented prior to each reload cycle, or prior to any remaining portion of the cycle, for the following:
- a. Axial Flux Difference limits for Specifications 3.10.2.
 - b. Height Dependent Heat Flux Hot Channel Factor for Specification 3.10.2.
 - c. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3.10.2.
 - d. Shutdown Bank Insertion Limit for Specification 3.10.4.

6.14 PROCESS CONTROL PROGRAM (PCP)

6.14.1 Licensee initiated changes to the PCP:

Note: This instance of "Semiannual" is being changed under the proposed Technical Specification Amendment dated February 14, 2000.

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information,
 - b. a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes, and
 - c. documentation of the fact that the change has been reviewed and found acceptable by the SNSC.
2. Shall become effective upon review and acceptance by the SNSC.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.15.1 The ODCM shall be approved by the Commission prior to implementation.

6.15.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the ~~Semiannual~~ Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluation justifying the change(s),
 - b. a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations, and
 - c. documentation of the fact the change has been revised and found acceptable by the SNSC.

2. Shall become effective upon review and acceptance by the SNSC.

6.16 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE SYSTEMS

6.16.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the ~~Semiannual~~ Radioactive Effluent Release Report for the period in which the change was made. The discussion of each change shall contain:

- a. a summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59,
- b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information,
- c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems,
- d. an evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto,
- e. an evaluation of the change, which shows the expected maximum exposures to individuals in the Unrestricted Area and to the general population that differ from those previously estimated in the license application and amendments thereto,
- f. a comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes are to be made;
- g. an estimate of the exposure to plant operating personnel as a result of the change, and
- h. documentation of the fact that the change was reviewed and found acceptable by the SNSC.

ATTACHMENT 3 TO NL 00-148

**LICENSE AMENDMENT REQUEST
TECHNICAL SPECIFICATION PAGES IN
REVISION BAR FORMAT**

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

APPENDIX A

TO

FACILITY OPERATING LICENSE DPR-26

FOR

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING PLANT UNIT NO. 2

DOCKET NO. 50-247

TECHNICAL SPECIFICATIONS AND BASES

Amendment No.

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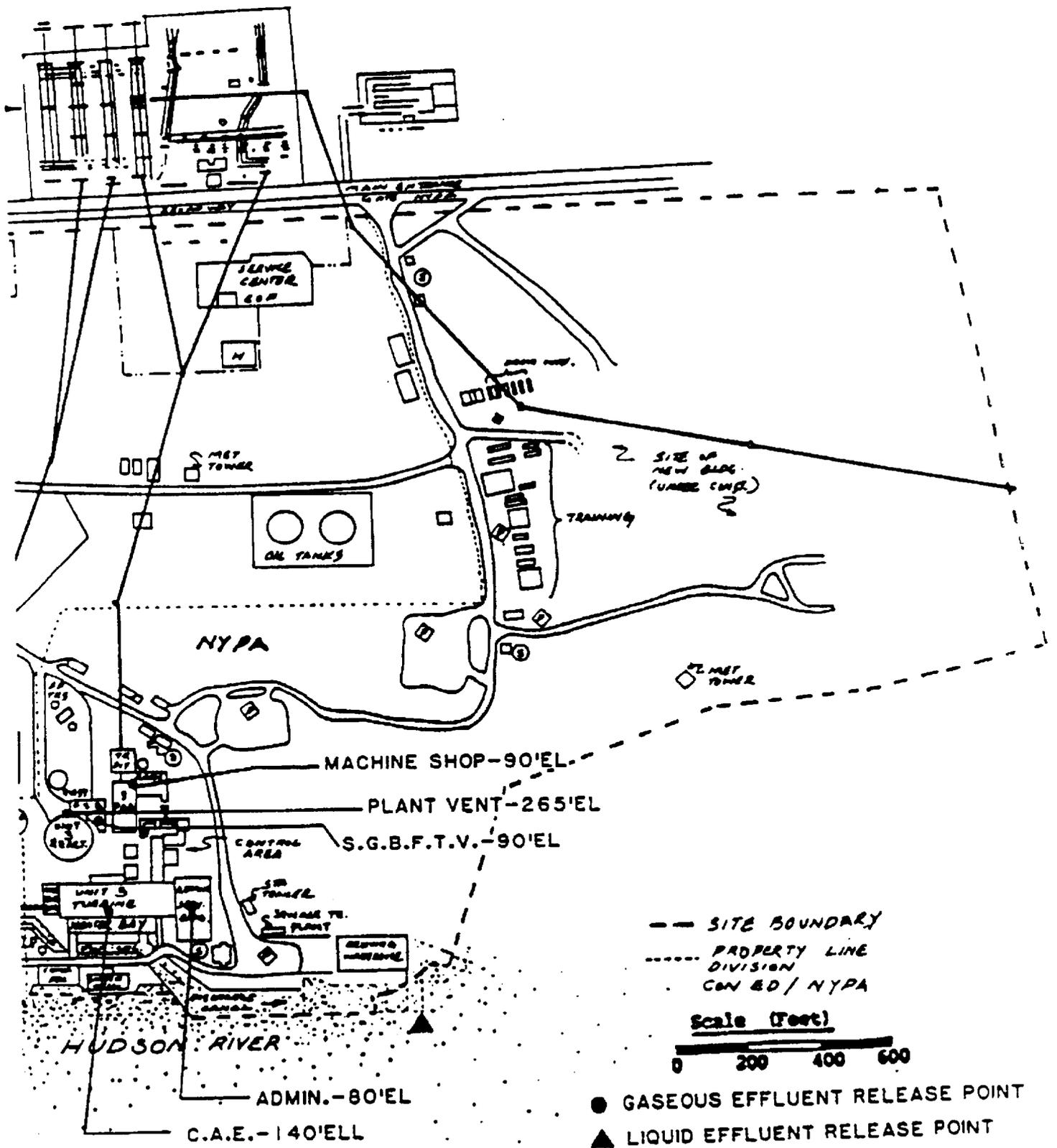
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Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Description (QAPD).
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

- c. principal radionuclides (specify whether determined by measurement or estimate),
- d. source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to Unrestricted Areas of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Report shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 4.11.B.

MONTHLY OPERATING REPORT

- 6.9.1.7 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or pressurizer safety valves shall be submitted on a monthly basis to the NRC no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT (COLR)

- 6.9.1.8 Core operating limits shall be established and documented prior to each reload cycle, or prior to any remaining portion of the cycle, for the following:
 - a. Axial Flux Difference limits for Specifications 3.10.2.
 - b. Height Dependent Heat Flux Hot Channel Factor for Specification 3.10.2.
 - c. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3.10.2.
 - d. Shutdown Bank Insertion Limit for Specification 3.10.4.

6.14 PROCESS CONTROL PROGRAM (PCP)

6.14.1 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information,
 - b. a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes, and
 - c. documentation of the fact that the change has been reviewed and found acceptable by the SNSC.
2. Shall become effective upon review and acceptance by the SNSC.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.15.1 The ODCM shall be approved by the Commission prior to implementation.

6.15.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
 - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluation justifying the change(s),
 - b. a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations, and
 - c. documentation of the fact the change has been revised and found acceptable by the SNSC.

2. Shall become effective upon review and acceptance by the SNSC.

6.16 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE SYSTEMS

6.16.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Radioactive Effluent Release Report for the period in which the change was made. The discussion of each change shall contain:

- a. a summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59,
- b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information,
- c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems,
- d. an evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto,
- e. an evaluation of the change, which shows the expected maximum exposures to individuals in the Unrestricted Area and to the general population that differ from those previously estimated in the license application and amendments thereto,
- f. a comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes are to be made;
- g. an estimate of the exposure to plant operating personnel as a result of the change, and
- h. documentation of the fact that the change was reviewed and found acceptable by the SNSC.