

May 29, 2001

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

SUBJECT: CHANGES TO TECHNICAL SPECIFICATIONS BASES, INDIAN POINT
NUCLEAR GENERATING UNIT NO. 2 (TAC NO. MA3866)

Dear Mr. Blind:

In a letter dated August 21, 1998, the Consolidated Edison Company of New York, Inc. (the licensee), provided to the U.S. Nuclear Regulatory Commission (NRC) a revised Technical Specifications (TSs) Bases Section 3.1.D, "Maximum Reactor Coolant Activity," for the Indian Point Nuclear Generating Unit No. 2 (IP2). The TS Bases change increased the time required to isolate a faulted steam generator from the current 30 minutes to 45 minutes. The licensee analyzed the worst credible set of circumstances, a double-ended break of a single tube, with the air ejector discharging to the atmosphere, followed by isolation within 45 minutes of the faulted steam generator. Approximately one-sixth of the total reactor coolant could be released during this period. The resultant dose increase at the site boundary is minimal (thyroid dose of 2.7 rem vs. the previously analyzed 2.4 rem, and 0.7 rem whole body dose vs. the previously analyzed 0.5 rem). The steam generator tube rupture analysis break flow licensing basis remains conservative even if the 30-minute assumption for break flow termination is increased by 15 minutes.

On February 15, 2000, the licensee experienced a steam generator tube failure (SGTF) at IP2. The event resulted in an initial primary-to-secondary leak of reactor coolant of approximately 146 gallons per minute, and required the licensee to declare an "Alert" emergency action level. The event resulted in a minor radiological release to the environment that was well within regulatory limits. There were no off-site dose consequences.

In light of this event, the NRC staff held a telephone conference call with the licensee on October 19, 2000, discuss the time line for the steam generator isolation during the February 2000 event and its relation to this TS Bases change. The licensee stated that the February event was not a tube "rupture". Rather, it was a tube "leak," and the criteria for 45-minute isolation for a tube rupture did not apply to the event. In the IP2 Updated Final Safety Analysis Report Chapter 14, Section 2, the licensee defines the criteria for a steam generator tube rupture for this TS Bases change as a "complete tube break adjacent to the tube sheet."

The licensee manages its operator actions for a tube rupture versus a tube leak by different abnormal operating (AO) procedures. The licensee followed its applicable procedure for responding to a tube leak and isolated the faulty steam generator. On February 15, 2000, at 1917 hours, in response to a high radiation alarm on the No. 24 main steam line high radiation monitor, the operators entered procedure AO-1.2, "SG Tube Leak." At 1935 hours, due to plant

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conditions at that time, the operators entered procedure ES-0.1 "Reactor Trip Response." By 2018 hours, the operators re-entered procedure AO-1.2, to isolate the No. 24 steam generator. By 2031 hours, the operators had completed isolating No. 24 steam generator. The staff concludes that the licensee's change to TS Bases 3.1.D had no impact on the February 15 SGTF event. Additional details regarding this event are documented in NRC inspection report no. 50-247/2000-002, dated April 28, 2000.

The NRC staff has reviewed the TS Bases change and has no objection to the change. The enclosed TS basis pages are being distributed for inclusion in the IP2 TSs.

Sincerely,

/RA/

Patrick D. Milano, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: Revised TSs Pages 3.1.D-1 to 3.1.D-3

cc w/encl: See next page

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