

A. Alan Blind
Vice President

May 8, 2001

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Re: Indian Point Unit No. 2
Docket No. 50-247
NL 01-058

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop 0-1-17
Washington, DC 20555-0001

SUBJECT: Indian Point 2 License Amendment Request to Change the Control Rod Movement Test Frequency to Quarterly

Transmitted herewith is an Application for Amendment to the Operating License. This application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit No. 2 (IP2) Technical Specifications (TS). The purpose of this License Amendment Request is to change the IP2 TS frequency for control rod movement testing from "Every 31 days during reactor critical operations" to "Quarterly during reactor critical operations" in item 2 of Table 4.1-3, "Frequencies for Equipment Tests."

Attachment 1 to this letter provides the description and evaluation of the proposed change. The revised TS page is provided in Attachment 2 (strikeout/shadow format).

The proposed TS changes do not require implementation by a specific date. However, Con Edison requests a timely review and NRC approval of the proposed change by October 31, 2001 with an implementation date within 60 days of approval.

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

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

There are no commitments contained in this submittal.

A001

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 that reads "A. Alan Blind". The signature is written in a cursive style with a large initial "A" and a stylized "Blind".

Alan Blind
Vice President - Nuclear Power

Attachments

cc:

Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
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Mr. Patrick D. Milano, Project Manager
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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 revision is set forth in the attachment. The associated assessment demonstrates that the proposed change does not involve 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 evaluation concluding that the proposed change does not involve a significant hazards consideration has been provided to the appropriate New York State official designated to receive such amendments.

BY: A. Alan Blair

Subscribed and sworn to
before me this 8 day
May, 2001.

Ersilia A. Amanna (Review)
Notary Public

ERSILIA A. AMANNA
Notary Public, State of New York
No. 01AMB038689
Qualified in Westchester County
Commission Expires March 20, 2002

ATTACHMENT 1 TO NL 01-058

LICENSE AMENDMENT REQUEST

CHANGE THE CONTROL ROD MOVEMENT TEST FREQUENCY TO QUARTERLY

**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) as described below.

The proposed change affects item 2 of TS Table 4.1-3, "Frequencies for Equipment Tests," which requires movement of at least 10 steps in any one direction of all control rods every 31 days during reactor critical operations. The requested change proposes to adjust this frequency interval to quarterly during reactor critical operations.

REASONS FOR THE CHANGE

As documented in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," the NRC Staff performed a comprehensive examination of surveillance requirements in TS that require testing during power operation. NUREG-1366 found that, while the majority of testing at power is important, safety could be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing that the TS require at power. NUREG-1366 specifically recommended that the frequency of control rod movement surveillance testing during power operation be changed to quarterly.

Subsequently, the NRC issued Generic Letter (GL) 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation." In GL-93-05 the NRC encouraged licensees to propose TS changes that are consistent with the GL's recommendations. Recommendation 4.2.1 of GL 93-05 recommended changing the frequency of the control rod movement test to quarterly.

Con Edison has concluded that these benefits described in NUREG-1366 will occur at IP2 by implementing this change.

EVALUATION OF THE PROPOSED CHANGE

Neutron absorbing control rods are capable of rapid insertion into the core to provide fast shutdown reactivity control. Exercising control rods provides an increased confidence that the control rods can perform their safety function to rapidly insert fully into the reactor core when the reactor trip breakers are opened.

In NUREG-1366, the NRC staff found that:

- The purpose of PWR control rod movement testing is to detect rods that cannot move.
- Most stuck rods are discovered during plant startup during manual pulling of the rods or during rod drop testing.
- The control rod tests cause reactor trips, dropped rods, and unnecessary challenges to safety systems.

Hence in NUREG-1366, the NRC staff recommended changing the frequency of PWR control rod movement tests to quarterly.

The proposed change is consistent with the frequency specified in NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," and recommendation 4.2.1 of GL 93-05.

The low testing failure rate identified during past performances of the control rod exercise tests at IP2 is consistent with the industry operating experience.

This request is similar to that of Wisconsin Electric Power Company (WE) Point Beach Nuclear Plant (PBNP), Units 1 and 2; dockets 50-266 and 50-301 respectively. On March 22, 2000, the NRC issued Amendment 195 to Facility Operating License No. DPR-24 for PBNP Unit 1 and Amendment 200 to Facility Operating License No. DPR 27 for PBNP Unit 2. These amendments changed the control rod surveillance interval for partial movement of control rods to "quarterly." In its Safety Evaluation Report, the NRC concluded its evaluation by reiterating the GL 93-05 findings that the proposed testing period will reduce the potential for dropped rods or reactor trip and prevent unnecessary challenges to safety systems without diminishing the capability of detecting mechanical binding of control rods.

NO SIGNIFICANT HAZARDS CONSIDERATION

Con Edison has determined that this proposed Technical Specification change does not involve a significant hazards consideration as defined by 10 CFR 50.92(c).

- 1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.**

This change to the frequency of performance of surveillance does not result in any hardware changes or nor does it change the response of control rods in performing their specified function. Therefore the change cannot affect the probability of occurrence of previously evaluated accidents.

The proposed frequency has been determined to be adequate to assure the reliability of reactor trip based on the conclusions in NUREG 1366 and the recommendations of GL 93-05.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not introduce a new failure mechanism or a new or different type of accident than those previously evaluated since there are no physical changes being made to the facility. Performance of the surveillance on the revised frequency will not have an adverse affect on the ability of the control rods to perform their intended function. The proposed change does not degrade the reliability of systems, structures, or components or create a new accident initiator or precursor. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety.

The proposed reduction in surveillance testing reduces the risk for causing dropped rods or reactor trips. This results in a slight improvement in the margin of safety by decreasing challenges to reactor components and safety systems.

The proposed surveillance frequency, as supported by the industry experience described in NUREG-1366, continues to provide the required assurance of control rod operability, such that safety margins established through the design and facility license, including the Technical Specifications, remain unchanged.

Therefore, operation of the facility in accordance with the proposed amendment is expected to result in a slight net improvement in the margin of safety. Hence the proposed change would not involve a significant reduction in the margin of safety.

CONCLUSIONS

Based on the above evaluation, Con Edison has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously analyzed; will not result in a new or different kind of accident from any accident previously analyzed; and, does not result in a reduction in any margin of safety. Therefore, operation of IP2 in accordance with the proposed amendment does not involve in a significant hazards consideration. In addition, the proposed change to the TS has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC). Both committees concur that the

proposed change does not represent a significant hazards consideration.

ENVIRONMENTAL ASSESSMENT

An environmental assessment is not required for the above proposed change because the requested change to the Indian Point Generating Station Unit 2 Technical Specifications conform to the criteria for “actions eligible for categorical exclusion,” as specified in 10 CFR 51.22(c)(9). The requested change will have no impact on the environment. The proposed change does not involve a significant hazards consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed change does not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT 2 TO NL 01-058

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

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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 Quarterly 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.