



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Entergy Nuclear Indian Point 2, LLC
P. O. Box 249
Buchanan, NY 10511

September 20, 2001

Re: Indian Point Unit No. 2
Docket No. 50-247
NL 01-112

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

SUBJECT: License Amendment Request (LAR 01-011) - Deletion of Technical Specifications for the Post Accident Sampling System Using the Consolidated Line Item Improvement Process

Pursuant to 10CFR50.90, Entergy Nuclear Operations, Inc. (ENO), requests an amendment to the Indian Point Unit No. 2 (IP2) Technical Specifications (TS). The proposed amendment would delete TS section 6.8.4.a requirements to have and maintain the Post Accident Sampling System (PASS). The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of the TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIP).

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

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 involve a significant hazards consideration as defined by 10CFR50.92(c).

ENO requests that the proposed changes be approved by March 31, 2002 with an effective date within 60 days of approval. The approval date is requested to coordinate the deletion of PASS from the TS with the planned implementation of the core damage assessment methodology of WCAP-14696-A, Rev. 1, "Westinghouse Owners' Group Core Damage Assessment Guidance," at IP2 during the first quarter of 2002.

In accordance with 10CFR50.91, a copy of this submittal and the associated attachments is being submitted to the designated New York State official.

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New commitments made by ENO in this letter are listed in Attachment 3.

Should you have any questions or require additional information, 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 "Fred Dacimo". The signature is written in a cursive style with a large initial "F" and a long horizontal stroke at the end.

Fred Dacimo
Vice President – Operations
Indian Point 2

Attachments

cc:

Hubert J. Miller
Regional Administrator
US Nuclear Regulatory Commission
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King of Prussia, PA 19406

Mr. Patrick D. Milano, Project Manager
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
ENERGY NUCLEAR OPERATIONS, INC) Docket No. 50-247
Indian Point Nuclear Generating Unit No. 2))

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission (NRC), Entergy Nuclear Operations, Inc., 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 10CFR50.92(c).

As required by 10CFR50.91(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: 
Fred Dacimo
Vice President – Operations
Indian Point 2

Subscribed and sworn to
before me this 20 day
September, 2001.


Notary Public

ERSILIA A. AMANNA
Notary Public, State of New York
No. 01AM808888
Qualified in Westchester County
Commission Expires March 20, 2002

ATTACHMENT 1 TO NL 01-112

LICENSE AMENDMENT REQUEST

**DELETION OF TECHNICAL SPECIFICATIONS
FOR THE POST ACCIDENT SAMPLING SYSTEM**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247**

LICENSE AMENDMENT REQUEST

DESCRIPTION OF THE PROPOSED CHANGE

The proposed license amendment deletes the program requirements of Technical Specification (TS) 6.8.4.a for a Post Accident Sampling System (PASS).

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this TS improvement was announced in the Federal Register, Vol. 65, No. 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

EVALUATION OF THE PROPOSED CHANGE

Applicability of Published Safety Evaluation

ENO has reviewed the safety evaluation published on October 31, 2000, as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis"). ENO has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to IP2 and justify this amendment for the incorporation of the change to the IP2 Technical Specifications.

Optional Changes and Variations

ENO is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000. The NRC staff's model safety evaluation identified that other TS or TS Bases changes might be needed if PASS were 1.) described in the program requirements for the program to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident; or 2.) identified as an alternate means of determining containment hydrogen monitor concentration. ENO has determined that no changes are necessary, as follows:

- The IP2 license includes Condition 2.L that has a requirement to implement a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. There is no explanatory language in the license condition that identifies PASS, or any other system, as being specifically included in the program.
- TS Table 3.5-5, Accident Monitoring Instrumentation, Item 11, Containment Hydrogen Concentration Monitor, specifies entry into Applicable Action 3 if the minimum number of channels are not operable. Action 3 allows IP2 to initiate an alternate means of monitoring the parameter. Nowhere in the TS or the TS Bases is PASS identified as the alternate means of monitoring containment hydrogen concentration.

Requirement for PASS

Requirements for installing and maintaining a PASS were included in a Confirmatory Order issued to Consolidated Edison for IP2 on March 18, 1983. This License Amendment Request includes a request to supersede the requirements of that Confirmatory Order for a PASS.

Verification and Commitments

As discussed in the notice of availability published in Federal Register on October 31, 2000, for this technical specification improvement, the required plant-specific verifications were performed as follows:

1. ENO currently has and will maintain contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, the containment recirculation sump, and the vapor containment atmosphere. Chemistry procedures exist to implement these contingency plans. Maintaining the capability for obtaining and analyzing highly radioactive samples of the reactor coolant, the containment recirculation sump, and the vapor containment atmosphere is considered a regulatory commitment.
2. ENO currently has and will maintain the capability for classifying fuel damage events at the Alert level threshold at radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability is described in the IP2 Emergency Plan Implementing Procedures. Maintaining the capability for classifying fuel damage events is considered a regulatory commitment.
3. ENO currently has the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in our Emergency Plan Implementing Procedures. Maintaining the capability to monitor radioactive iodines that have been released offsite to the environs is considered a regulatory commitment.

NO SIGNIFICANT HAZARDS CONSIDERATION

ENO has reviewed the proposed no significant hazards consideration determination published as part of the CLIP. ENO has concluded that the proposed determination presented in the notice is applicable to IP2 and the determination is hereby incorporated, by reference to satisfy the requirements of 10CFR50.91(a). 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 involve a significant hazards consideration as defined by 10CFR50.92(c).

ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIP. ENO has concluded that the staff's findings presented in that evaluation are applicable to IP2 and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2 TO NL 01-112

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

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Added text is shown as shaded.

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT UNIT NO. 2
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- d. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975.
 - e. Fire Protection Program implementation.
- 6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with the Quality Assurance Program Description (QAPD).
- 6.8.3 The Quality Assurance Program Description (QAPD) shall describe the mechanism for making temporary changes.
- 6.8.4 The following programs shall be established, implemented, and maintained:
- a. A program which will ensure the capability to obtain and analyze samples of ~~reactor coolant~~, radioactive iodines and particulates in plant gaseous effluents, ~~and containment atmosphere~~ under accident conditions. The program shall include the following:
 - (i) training of personnel,
 - (ii) procedures for sampling and analysis, and
 - (iii) provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

Routine Reports and Reportable Occurrences

- 6.9.1. In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator, Region I unless otherwise noted.

ATTACHMENT 3 TO NL 01-112

COMMITMENTS

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247**

Number	Commitment	Schedule
1.	Contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, the containment recirculation sump, and the containment atmosphere will be maintained.	Within the implementation period of the approved License Amendment.
2.	The capability for classifying fuel damage events at the Alert level threshold at radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine will be maintained.	Within the implementation period of the approved License Amendment.
3.	The capability to monitor radioactive iodines that have been released offsite to the environs will be maintained.	Within the implementation period of the approved License Amendment.