

March 27, 2002

Mr. Michael R. Kansler
Senior Vice President and
Chief Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - AMENDMENT RE: ONE
TIME EXTENSION OF TECHNICAL SPECIFICATION SURVEILLANCE
INTERVALS (TAC NO. MB2990)

Dear Mr. Kansler:

The Commission has issued the enclosed Amendment No. 225 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 September 20, 2001.

The amendment allows the one-time extension of the intervals for selected TS surveillance requirements associated with the volume control tank, residual heat removal system, emergency diesel generators, and shock suppressors (snubbers). In addition, the amendment: (1) corrects the channel functional test interval in Items 3 and 4 of TS Table 4.10-2 and Items 4 and 5 of Table 4.10-4, (2) deletes the alternate inspection requirements for the steam generator snubbers, and (3) removes the reference to a prior one-time extension of checks, calibrations, and tests for certain instrument channels in TS Table 4.1-1 that is no longer applicable.

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,

/RA/

Patrick D. Milano, Sr. 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. 225 to DPR-26
2. Safety Evaluation

cc w/encls: See next page

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* See previous concurrence

cc w/encls: See next page

Accession Number: ML020430462

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OFFICIAL RECORD COPY

DATED: March 27, 2002

AMENDMENT NO. 225 TO FACILITY OPERATING LICENSE NO. DPR-26 INDIAN POINT
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ENTERGY NUCLEAR INDIAN POINT 2, LLC

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 225
License No. DPR-26

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (the licensee) dated September 20, 2001, 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 225, 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 and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Joel T. Munday, Acting 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: March 27, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 225

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

Table 1-1
Table 4.1-1 (1 of 8)
Table 4.1-1 (2 of 8)
Table 4.1-1 (3 of 8)
Table 4.1-1 (4 of 8)
Table 4.1-1 (5 of 8)
Table 4.1-1 (6 of 8)
Table 4.1-3 (1 of 1)
4.4-2
4.4-3
4.4-4
4.5-1
4.5-2
4.5-4
4.5-11
4.6-1
4.6-2
Table 4.10-2 (1 of 2)
Table 4.10-4 (1 of 3)
4.12-3
4.12-6

Insert Pages

Table 1-1
Table 4.1-1 (1 of 8)
Table 4.1-1 (2 of 8)
Table 4.1-1 (3 of 8)
Table 4.1-1 (4 of 8)
Table 4.1-1 (5 of 8)
Table 4.1-1 (6 of 8)
Table 4.1-3 (1 of 1)
4.4-2
4.4-3
4.4-4
4.5-1
4.5-2
4.5-4
4.5-11
4.6-1
4.6-2
Table 4.10-2 (1 of 2)
Table 4.10-4 (1 of 3)
4.12-3
4.12-6

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 225 TO FACILITY OPERATING LICENSE NO. DPR-26
ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247

1.0 INTRODUCTION

By letter dated September 20, 2001, Entergy Nuclear Operations, Inc. (the licensee) submitted a request for changes to the Indian Point Nuclear Generating Unit No. 2 (IP2) Technical Specifications (TSs). The requested changes would allow the one-time extension of the surveillance requirement (SR) intervals for TS Table 4.1-1, Item 17, Sections 4.4.H, 4.6.A, and 4.12.B. These SRs are associated with the volume control tank (VCT), residual heat removal (RHR) system, emergency diesel generators (EDGs), and shock suppressors (snubbers). In addition, the changes would reinstate SRs that were inadvertently removed from the TSs. These SRs include, TS Table 4.10-2, Radioactive Liquid Effluent Instrumentation Items: 3.a, 3.b, 4.a, 4.b, and 4.c; and TS Table 4.10-4, Radioactive Gaseous Effluent Monitoring SR Items: 4.d, 5.a, and 5.d.

2.0 BACKGROUND

The IP2 surveillance tests mentioned above have a normal performance frequency of 24 months (not to exceed 30 months). These tests are performed while the plant is at shutdown. The licensee scheduled the tests to be performed during their refueling outage (RFO), which should have been in the spring of 2002. This date falls within the TS allowable extension for performing the tests. However, due to delays in the startup from an unscheduled steam generator replacement outage in 2000, these SRs will expire prior to the 2002 refueling outage, now scheduled for the fall of 2002. Therefore, the licensee is requesting an extension to perform the SRs at the start of the fall 2002 refueling outage, but no later than November 19, 2002. Without this one-time extension, an outage will be necessary to perform the required surveillance.

3.0 EVALUATION

3.1 TS Table 1-1 and Table 4.1-1, Deletion of Prior One-Time Extensions

TS Table 1-1, "Frequency Notation," specifies, in part, the one-time extension of the frequency for conducting SRs denoted by the designation "R##." In Amendment No. 204, dated October 29, 1999, the NRC staff approved a one-time extension of certain SRs to be completed no later than June 3, 2000. This prior one-time extension was associated with several checks, calibrations, and tests of instrument channels as listed in TS Table 4.1-1, "Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels," and Table 4.1-3,

“Frequencies for Equipment Tests.” In Table 4.1-1, the TSs also noted an additional one-time extension for certain calibrations to 37 months. Since the periods for performance of the prior one-time extensions have expired, the licensee proposed deleting them from the TSs. These deletions are associated with Items 4, 5, 6, 7, 8.a, 8.b, 11, 13, 21a, 21b, 21e, 22a, 22b, 23, 27, 29.a, 29.b, 29.c, 30.a, 30.c, 34, 36, and 37 of Table 4.1-1 and Items 3, 4, and 5 of Table 4.1-3.

Since the completion dates for the one-time extensions of the SRs mentioned above have elapsed, the one-time extensions are no longer applicable and the original frequency intervals are now applicable. Thus, the NRC staff finds the restoration of the original surveillance frequency intervals to be acceptable.

3.2 TS Table 4.1-1, Item 17

TS Table 4.1-1, “Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels,” Item 17 - Volume Control Tank Level, requires the calibration of the instrumentation function at least once every 24 months (i.e., 24-month refueling interval). In accordance with TS 4.0.1, “Surveillance Interval Extension,” a surveillance interval may, unless otherwise noted, be performed within the specified interval with a maximum allowable extension not to exceed 25 percent of the specified interval. Thus, the calibration of VCT level could be performed within 30 months of the prior test.

The Chemical and Volume Control System collects the reactor coolant surge volume resulting from a change from zero power to full power. It also receives the excess reactor coolant release, acts as a head tank for the charging pumps, and functions as a reservoir for the leakage from the reactor coolant pump (RCP) controlled leakage seals.

The licensee has proposed a one-time extension of the surveillance interval for the VCT level channel calibration tests to the end of the current operating cycle, not to exceed November 19, 2002. The tests include: PC-R13-1 for calibration of the VCT level transmitter and PC-R13 for calibration of the VCT Level channel. These tests are currently required to be completed by November 2 and November 12, 2002, respectively. The licensee stated that the tests cannot be performed on-line because of the potential for plant transients to occur because of reactor coolant system volume perturbations. In addition, since these surveillance tests require the charging pumps to be shutdown, there is an increased risk to the RCP seals as well as an increased possibility of a loss of the normal boric acid addition flow path during the tests. Approval of the requested extension would result in a maximum delay of 9 days to the TS maximum allowable surveillance interval.

The licensee states that the Instrument History Performance Analysis (IHPA) Computer Program was used to evaluate whether the expected VCT level instrument drift will accommodate a 31-month surveillance interval. The program evaluates all pertinent information including previous as-found and as-left surveillance data for the applicable equipment. In this regard, the licensee stated that the IHPA calculations found that the 31-month estimate was bounded by the channel statistical allowances which were established for the VCT level instrument function. These allowances specify all channel uncertainties, including sensor, rack, measurement and test equipment, and process effects for normal and applicable adverse environmental conditions.

Based on the above information, the NRC staff finds that the proposed one-time extension of

the SR interval for VCT Level from 30 months (24 months plus 25%) to a maximum one-time interval of 30 months and 9 days would have no significant impact on the VCT Level calibration and function. Therefore, the proposed change is acceptable.

3.3 TS Section 4.4.H

TS Section 4.4.H.1.a(2) specifies the requirements for performing hydrostatic tests of selected portions of the RHR piping system. The hydrostatic test is performed at no less than 100 psig for the portion of RHR piping from the pump suction to the containment isolation valves. The licensee implements this SR per performance test procedure no. PT-R27A which calls for hydrostatic testing between valves 885A and 885B, checking for external leakage from the piping and valves 885A and 885B, and determining seat leakage on valves 885A, 885B, and 741A. However, the licensee stated that the only portion of PT-R27A requiring the extension is the external leakage determination between containment isolation valves 885A and 885B. The current due date for completion of this SR is October 23, 2002.

The licensee checks for external leakage using its inspection procedure no. PI-R4. This test, in conjunction with other procedures, are used to ensure that leakage outside containment remains less than 2 gallons per hour as specified in TS 4.4.H.2 at least once every 24-month refueling interval as specified in TS 4.4.H.4. In addition to TS 4.4.H, the licensee conducts the inspection of PI-R4 as part of leakage test program in Facility Operating License Condition 2.L, which requires the tracking and limiting of external leakage from systems outside the vapor containment that could contain highly radioactive fluids during an accident. The current due date for this SR is November 11, 2002.

The licensee stated that, if these tests are performed during operation, the RHR system would require additional time to transition to its required safety function lineup in the event of an accident. In addition, the tests would pose the risk of unexpected leakage past valves into the containment building. This leakage would go through high radiation areas and collect in the containment sump, which is required to be empty during plant operation. Also, these tests cannot be performed during a short outage, because they require the RHR system to be out of service. During short outages, the residual heat load is high, requiring the availability of the RHR system to mitigate the heat. Because of these adverse effects, this test is performed only during refueling outages.

The RHR system is designed, constructed, and maintained to minimize the development of leaks. The licensee stated that test data for the PT-R27A tests from 1986 to 2000 showed that the measured external leakage from the piping system was 0.00 gph. The data from the PI-R4 tests showed leakage of 0.0 cc/min for the last operating cycle and 9.0 cc/min for the previous cycle.

Based upon the above information, the NRC staff finds that the results of the prior surveillance tests indicate that the adequate leak tightness of the RHR system and the low possibility of system degradation during the period of extension. The one-time extension of tests PT-R27A and PI-R4 of less than 1 month should have minimal impact on the expected test results. Because the integrity of the piping sections covered by these tests has been adequately demonstrated, and because the delay should have minimal effects on the test results, the NRC finds the proposed one-time extension acceptable.

3.4 TS Section 4.6.A

TS Section 4.6.A.2, "Diesel Generators," requires that, at every refueling interval (every 24 months), each EDG shall be manually started, synchronized, and loaded to its continuous (nameplate) and short-term ratings. In accordance with TS 4.0.1, "Surveillance Interval Extension," a surveillance interval may, unless otherwise noted, be performed within the specified interval with a maximum allowable extension not to exceed 25 percent of the specified interval. Thus, the EDG tests could be performed within 30 months of the prior tests.

IP2 has three EDGs (21, 22, 23) to provide emergency on-site AC electrical power. Each EDG is capable of providing 1750 kW (continuous), 2100 kW for 2 hours in any 24-hour period and 2300 kW for a ½ hour period. Additionally, the EDGs are capable of starting and reaching normal speed in less than 10 seconds. The licensee requests that a one-time extension of the surveillance interval for TS 4.6.A.2, which is satisfied by the EDG load tests listed below:

<u>Test Description</u>	<u>Current Due Date</u>
PT-R84A, 21 EDG 24 Hour Load Test or PT-R84A-1, 21 EDG Alternate 24 Hour Load Test	October 10, 2002
PT-R84B, 22 EDG 24 Hour Load Test or PT-R84B-1, 22 EDG Alternate 24 Hour Load Test	November 7, 2002
PT- R84C, 23 EDG 24 Hour Load Test or PT-R84C-1, 23 EDG Alternate 24 Hour Load Test	November 15, 2002

The licensee stated that the tests have not been performed with the unit on-line because the test configuration involves an abnormal electrical system lineup. Also, approval of the surveillance interval extension would result in less than a 2-month extension of the TS maximum allowable surveillance interval.

The licensee evaluated all of the EDG surveillance results which involve load tests for the last 8 years to determine the performance history of each EDG and to prove the capability of meeting the continuous (nameplate) and short-term load ratings. The functional test history indicated that all tests demonstrated satisfactory results except for three tests involving failures. Two of the test failures were caused by operator action and were not representative of EDG load capability. The licensee determined that the third test failure, on the other hand, was caused by maintenance related activities which resulted in a limitation of the range of movement of the fuel control lever arm. This limited movement only allowed the EDG to reach a maximum output of 2275 kW instead of the required 2300 kW. The licensee stated that it thoroughly analyzed all functional test failures and took appropriate action to prevent reoccurrence. Subsequent testing following the actions taken to correct the failures demonstrated that the EDGs met their design requirements. In addition to the load testing, the licensee also conducts monthly EDG testing during power operations which verifies the EDGs' ability to reach required speed and voltage and to assure EDG operability.

Based on the above information, the NRC staff finds that the prior test history along with the ongoing monthly EDG testing provides reasonable assurance that the EDGs will remain operable during the period of the SR extension. In addition, the proposed change of a one-time

extension of SR interval for TS 4.6.A.2 from 30 months (24 months plus 25%) to a maximum period less than 32 months is reasonably short time duration and should have no significant impact on EDG loading capability or EDG operations. Therefore, the staff finds the proposed change acceptable.

3.5 TS Section 4.12

TS 4.12.B, Shock Suppressors (Snubbers), Functional Testing, requires that samples of hydraulic snubbers be functionally tested for operability at least once every refueling interval (once every 24 months). In accordance with TS 4.0.1, "Surveillance Interval Extension," a surveillance interval may, unless otherwise noted, be performed within the specified interval with a maximum allowable extension not to exceed 25 percent of the specified interval. Thus, the snubber functional tests could be performed within 30 months of the prior tests.

Snubbers prevent unrestrained pipe motion under dynamic loads that might occur during an earthquake or severe transient, while allowing normal thermal motion during startup, normal operation, and shutdown. Systems that respond to plant events have their piping or components protected by snubbers, which are required to operate to prevent damage to the equipment.

The licensee has proposed a one-time extension of the surveillance interval for the snubber functional testing to the end of the current operating cycle, not to exceed November 19, 2002. These tests are performed on a representative sample (10%) of the snubbers. If any one of the snubbers removed for testing fails the acceptance criteria, the TS requires that an additional 10% sample must be removed and tested. This additional testing will continue until no failures are found or until all snubbers of the same type have been functionally tested. However, the licensee states that while some snubbers can be tested during plant operation, performance of all the required snubber inspections and tests online is precluded by concerns for accessibility, personal safety, potential interaction with safety-related equipment, lack of hot settings, and potential for significant personnel dose. Approval of the requested extension would result in a maximum delay of less than 1 month to the TS maximum allowable surveillance interval.

The licensee stated that the snubbers scheduled for testing (initial 10% sample population) during the next functional test cycle include 16 snubbers from the vapor containment, six from the auxiliary feedwater building, and one from the primary auxiliary building. In addition, one additional steam generator snubber will be removed for testing in the 2002 RFO due to functional test failures that occurred during the 2000 RFO. The licensee also stated that the removal of snubbers from systems located in the vapor containment creates risk to personnel and may require, in several cases, the erection of scaffolding over safety-related equipment in high radiation areas. Similarly, removal of snubbers from the auxiliary feedwater and primary auxiliary building requires the use of ladders or the construction of scaffolding over safety-related equipment. The licensee stated, therefore, that the removal of all the required snubbers during operation to perform functional testing would present an unacceptable level of risk to personnel and the plant.

For an added assurance on the continuing operability of the IP2 snubbers during the requested one-time extension of test interval, the licensee performed a review of the results of functional testing over an 11-year period (1989 through 2000). During this period, six snubbers (one in 1989, two in 1993, and three in 2000) did not pass the functional testing. In all cases, however,

the licensee performed corrective actions and engineering evaluations for the failure conditions to restore and evaluate the operability of the supported systems involved. The licensee concluded that for all six snubber failures identified, there was no adverse impact on the structural integrity of the supported systems, and the systems had no loss of operability due to the inoperable snubbers.

The staff reviewed the licensee's submittal and determined that the licensee's request for a one-time extension for the surveillance interval of the snubber functional testing is acceptable. This conclusion is based on: (1) the one-time extension is for a period of less than 1 month, and hence, would have an insignificant impact on snubber functionality; (2) the deferral of the surveillance test was caused by an unscheduled steam generator replacement outage in year 2000, during which the plant was in low stress conditions; (3) the historical data indicated that a relatively small number of IP2 snubbers failed functional testing, and no loss of operability has occurred to the systems with inoperable snubbers; (4) the structural integrity of the systems remain intact; and (5) removal of all the required snubbers during operation to perform functional testing would present an unacceptable level of risk to personnel and the plant without commensurate increase in plant safety.

TS 4.12.A, Shock Suppressors (Snubbers), Visual Inspection, sets requirements for visual inspection intervals for snubbers with seal material that is compatible with the operating environment. The licensee proposed removing the reference in Note 6 of TS 4.12.A, which refers to the alternate inspection requirements of the 24 snubbers that were installed at the steam generators. These snubbers had a common external reservoir and tubing. Leakage of hydraulic fluid from this external tubing was an unacceptable condition that was only applicable to these snubbers. Therefore, they were separately grouped with these inspection criteria as permitted by the issuance of License Amendment 62.

The licensee states that this portion of the TS is no longer applicable for snubbers installed at the steam generators, because the snubbers have since been modified by the use of an equivalent snubber that no longer has a common external hydraulic reservoir with its associated tubing. As a result, there is no longer the need to create a separate sample population just for the steam generator snubbers. The licensee, therefore, proposed to eliminate the conditional paragraph in TS 4.12.A that allowed the separate grouping of the steam generator snubbers. We find the licensee's proposed TS change acceptable, based on the fact that the conditional paragraph will never be entered, and that the ability of TS 4.12.A to provide an adequate visual inspections of snubbers is not affected by the proposed changed.

3.6 TS Tables 4.10-2 and 4.10-4

The licensee states that the staff approved in License Amendment 187 the revision of surveillance intervals for various systems and components from "R" (denoting 18-month frequency) to "R#" (denoting 24-month frequency) in accordance with the guidance provided from Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." These revisions pertained to the Channel Calibration intervals for:

- TS Table 4.10-2, Radioactive Liquid Effluent Monitoring Instrumentation SR Items:
 - 3.a Flow Measurement Devices - Liquid Radwaste Effluent Line
 - 3.b Flow Measurement Devices - Steam Generator Blowdown Effluent Line
 - 4.a Tank Level Indication Devices - 13 Waste Distillate Storage Tank
 - 4.b Tank Level Indication Devices - 14 Waste Distillate Storage Tank
 - 4.c Tank Level Indication Devices - Primary Water Storage Tank

- TS Table 4.10-4, Radioactive Gaseous Effluent Monitoring Instrumentation SR Items:
 - 4.d Vent Monitor - Flow Rate Monitor
 - 5.a Stack Vent - Noble Gas Activity Monitor
 - 5.d Stack Vent - Flow Rate Monitor

Subsequently, the staff approved License Amendment 198 which indicated for the subject items a Channel Calibration designation “R” or “R⁽³⁾” denoting an 18-month surveillance interval. The change from a 24-month surveillance interval to an 18-month surveillance interval had not been addressed by the safety evaluation for License Amendment 198. In addition, except the change in Table 4.10-4, Item 5.a from “P” to “M” for the source check frequency, this change to the surveillance intervals was not addressed in the license amendment request. Based on the above information, the staff concludes that the licensee’s request to restore the surveillance interval requirements for the above-mentioned items for TS Tables 4.10-2 and 4.10-4 to a 24-month frequency corrects an editorial oversight made in License Amendment 198. Therefore, the proposed change is acceptable.

The licensee proposed changing the R## test interval extension date from June 3, 2000, to November 19, 2002, in Table 1-1. The deletion of June 3, 2000, is acceptable because the one-time extension has expired. Additionally, based upon the review in the above safety evaluation, the staff finds the November 19, 2002, extension to be acceptable. All TS items included in the proposed extension were analyzed individually in the sections above.

4.0 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.

5.0 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. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (66 FR 55014). 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.

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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