

ATTACHMENT B

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Technical Specification
Page Revisions

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2

Docket No. 50-247

Facility Operating License No. DPR-26

March, 1978

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4.15 RADIOACTIVE MATERIALS SURVEILLANCE

Applicability

Applies to the surveillance of sealed special nuclear, source and byproduct material sources.

Objective

To assure that leakage from byproduct, source, and special nuclear radioactive material sources does not exceed allowable limits.

Specification

A. Tests for leakage and/or contamination shall be performed as follows:

1. Each sealed source, except startup sources and fission detectors, containing radioactive material, other than Hydrogen-3, with a half life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six months.
2. The periodic leak test required does not apply to sources that are stored and not being used. These sources shall be tested for leakage prior to any use or transfer to another user unless they have been leak tested within six months prior to the date of use or transfer. In the absence of a certificate from a transferor indicating that a test has been made within six months prior to the transfer, sealed sources shall not be put into use until tested.
3. Primary startup sources and fission detectors shall be leak tested prior to being subjected to core flux and following repair or maintenance to the source.

- B. Sealed sources are exempt from Specification 4.15.A when the source contains 100 microcuries or less of beta and/or gamma emitting material or 5 microcuries or less of alpha emitting material.
- C. The leakage test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the sealed source shall immediately be withdrawn from use and either decontaminated and repaired, or be disposed of in accordance with Commission regulations.
- D. A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2.e within 30 days if source leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

Basis

The limitations on sealed source removable contamination ensure that the total body or individual organ irradiation does not exceed allowable limits in the event of ingestion or inhalation of the probable leakage from the source material. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. Quantities of interest to this specification which are exempt from the leakage testing are consistent with the criteria of 10 CFR Parts 30.11-20 and 70.19. Leakage of sources excluded from the requirements of this specification is not likely to represent more than one maximum permissible body burden for total body irradiation if the source material is inhaled or ingested.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Each containment integrated leak rate test shall be the subject of a summary technical report including results of the local leak rate test since the last report. The report shall include analyses and interpretations of the results which demonstrate compliance in meeting the leak rate limits specified in the Technical Specifications.
- b. A report covering the X-Y xenon stability tests within three months upon completion of the tests.
- c. To provide the Commission with added verifications of the safety and reliability of the pre-pressurized Zircaloy-clad nuclear fuel, a limited program of non-destructive fuel inspections will be conducted. The program shall consist of a visual inspection (e.g., underwater TV, periscope, or other) of the two lead burnup assemblies in each region during the first, second, and third refueling shutdowns. Any condition observed by this inspection which would lead to unacceptable fuel performance may be the object of an expanded surveillance effort. If another domestic plant which contains pre-pressurized fuel of a similar design reaches fuel exposures equal to or greater than at Indian Point Unit No. 2, and if a limited inspection program is or has been performed there, then the program may not have to be performed at Indian Point Unit No. 2. However, such action requires approval of the Nuclear Regulatory Commission. The results of these inspections will be reported to the Nuclear Regulatory Commission.
- d. Inoperable fire protection and detection equipment (Specification 3.13).
- e. Sealed source leakage in excess of limits (Specification 4.15).

ATTACHMENT C

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Safety Evaluation

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2
Docket No. 50-247

Facility Operating License No. DPR-26

March, 1978

SAFETY EVALUATION

This Application for Amendment to Operating License is being submitted as originally suggested by letter dated December 16, 1974 from Mr. George Lear to Mr. William J. Cahill, Jr. The proposed changes to section 2.B of Facility Operating License No. DPR-26, set forth in Attachment A to this Application, would replace the present listing of individual items separately with the generalized license provisions for possession and use of byproduct, source and special nuclear materials. This modification would simplify the licensing of such materials and eliminate the need for license amendment for almost any change in licensed materials. The proposed revision in Attachment A is generally based on the "Standard License Format" provided as Enclosure 1 to Mr. Lear's December 16, 1974 letter but has been modified to reflect the generalized provisions contained in more recently issued operating licenses, such as the Indian Point Unit No. 3 facility operating license.

The proposed new Technical Specification 4.15, set forth in Attachment B to this Application, would incorporate specific leak testing and surveillance requirements for radioactive sealed sources. These proposed requirements are based on the sample technical specifications provided in Enclosure 2 of Mr. George Lear's letter as well as the more recent Standard Technical Specification (STS) versions, and also on Section 3.9 of the Indian Point Unit No. 3 Technical Specifications. Presently, leak testing and surveillance requirements for such material are performed in accordance with license conditions contained in Consolidated

Edison's site-wide Byproduct Material License No. 31-03112-01, as amended through Amendment No. 13 (license expires November 30, 1978), and site-wide Special Nuclear Material License No. SNM-495, as amended through Amendment No. 4 (license expires April 30, 1980).

The Radiation Safety Program presently in effect for the handling and control of sealed sources, including facilities, procedures and personnel, is a site-wide program and is implemented as described in Section 11.3 of the Indian Point Unit No. 3 Final Facility Description and Safety Analysis Reprot (FSAR). Certain aspects of the program are also addressed in the forementioned site-wide byproduct and SNM licenses.

The proposed changes do not in any way alter the safety analyses performed for Indian Point Unit No. 2. The proposed changes have been reviewed by the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee. Both committees concur that these changes do not represent a significant hazards consideration and will not cause any change in the types or increase in the amounts of effluents or any change in the authorized power level of the facility.