

ATTACHMENT C

Safety Evaluation

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
September, 1979

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Safety Evaluation

The proposed changes, contained in Attachments A and B to this Application, would modify the Operating License and the Indian Point Unit No. 2 Technical Specifications, respectively, to reflect a change in the value of the neutron multiplication factor and to incorporate a limit on the maximum fuel loading in the assemblies that are to be stored in the proposed new high density racks. The proposed change to Section 2.B of the license, would modify the license to include this proposed amendment. The changes in Attachment B to this Application are being proposed to conform the Indian Point Unit No. 2 Technical Specification requirements to the technical specifications contained in the NRC Guidance on spent fuel modifications entitled "Review and Acceptance of Spent Fuel Storage and Handling Applications" (transmitted by letter dated April 14, 1978, B. K. Grimes to all Power Reactor Licensees, and supplemented by letter dated January 18, 1979). On page III-5 of the above document the following is stated:

"(5) Technical Specifications

To insure against criticality, the following technical specifications are needed on fuel storage in high density racks:

1. The neutron multiplication factor in the fuel pool shall be less than or equal to 0.95 at all times.
2. The fuel loading (i.e., grams of uranium-235, or equivalent, per axial centimeter of assembly) in fuel assemblies that are to be loaded into the high density racks should be limited. The number of grams of uranium-235, or equivalent, put in the plant's technical specifications shall preclude criticality in the fuel pool."

In addition, a change to Technical Specification 5.3.A.3 is being proposed to conform Technical Specification 5.3.A.3 to Technical Specification 5.4.2. A minor change to Technical Specification 5.4.3 is also being proposed to eliminate a superfluous statement in this Technical Specification.

A report entitled "Preliminary Design Report for Reracking the Indian Point Unit No. 2 Spent Fuel Pool," which is being transmitted to the NRC by the same cover letter as this Application, provides a description of the proposed reracking of the spent fuel pool.

The proposed changes have been reviewed by the Station Nuclear Safety Committee and the Consolidated Edison 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.