William J. Cahill, Jr. Vice President

Consolidated Edison Company of New York, Inc. 4 Irving Place, New York, N Y 10003 Telephone (212) 460-3819

October 1, 1979

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Re: Consolidated Edison Company of New York, Inc. (Indian Point Station, Unit No. 2) Docket No. 50-247

Dear Mr. Denton:

Consolidated Edison Company of New York, Inc. ("Consolidated Edison") transmits herewith three (3) signed originals and forty (40) copies of a document entitled, "Application for Amendment to Operating License," sworn to on October 1, 1979. This Application requests an amendment to the Operating License for Indian Point Unit No. 2. The proposed license condition, contained in Attachment A to this Application, would establish a secondary water chemistry monitoring program to inhibit steam generator tube degradation and identify the scope of the program. These changes are being submitted as required by the letter from Mr. A. Schwencer (NRC) to Mr. William J. Cahill, Jr. (Consolidated Fdison), dated August 1, 1979 which forwarded the NRC Regulatory Staff's Model License Condition-Secondary Water Chemistry Monitoring. As directed by the August 1, 1979 letter, Consolidated Edison withdraws its previous request to establish technical specifications for this program, item 2 of the March 21, 1978 "Application for Amendment to Operating License," and submits this change in its place.

A Safety Evaluation of the proposed changes is presented in Attachment B to this Application.

As discussed in the August 1, 1979 letter, the NRC has determined that no license amendment filing fee is required for this Application. That determination is limited to those change applications involving the Model License Condition-Secondary Water Chemistry Monitoring. Accordingly, no filing fee per 10 CFR 170.22 is forwarded herewith.

An Affidavit of Service is enclosed.

Enclosures cc: Hon George V. Begany (w/encl.) Very truly yours,

William J. Čahill, Jr. Vice President

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point Station, Unit No. 2) Docket No. 50-247

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

In accordance with Section 50.90 of the regulations of the Nuclear Regulatory Commission, Consolidated Edison Company of New York, Inc. ("Consolidated Edison"), as holder of Facility Operating License No. DPR-26, hereby requests amendment of Section 2.D of that license.

The proposed changes to Section 2.D of the license, contained in Attachment A to this Application, would establish a secondary water chemistry monitoring program to inhibit steam generator tube degradation and identify the scope of that program. These changes are being submitted as required by the letter from Mr. A. Schwencer to Mr. William J. Cahill, Jr., dated August 1, 1979.

A Safety Evaluation of the proposed revisions is presented in Attachment B to this Application. This evaluation demonstrates that the proposed 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.

> CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

By: William J. //Cahill

Vice President

Subscribed and sworn to before me this 12 day of October, 1979.

Le.

Notary Public ANGELA ROBERTI Notary Public, State of New York No. 41-8593813 Qualified in Queens County Commission Expires March 30, 1980

ATTACHMENT A

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Facility Operating License Revisions

Consolidated Edison Company of New York, Inc.

Indian Point Unit No. 2 Docket No. 50-247 Facility Operating License No. DPR-26

October, 1979

FACILITY OPERATING LICENSE REVISIONS

- I. Renumber existing paragraph 2.D as 2.D.(1):
 - 2.D.(1) Steam Generator Inspections

The plant shall be brought to the cold shutdown condition within sixteen equivalent months of operation from August 31, 1979, but in any event, no later than May 1, 1981. For the purpose of this requirement, equivalent operation is defined as operation with a reactor coolant temperature greater than 350°F. An inspection of all four steam generators shall be performed and Nuclear Regulatory Commission approval shall be obtained before resuming power operation following this inspection.

- II. Add new paragraph 2.D.(2) as follows:
 - (2) Secondary Water Chemistry Monitoring

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

- (a) Identification of a sampling schedule for the critical parameters and control points for these parameters;
- (b) Identification of the procedures used to quantify parameters that are critical to control points;
- (c) Identification of process sampling points;
- (d) Procedure for the recording and management of data;
- (e) Procedures defining corrective actions for off control point chemistry conditions; and
- (f) A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.

ATTACHMENT B

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

October, 1979

SAFETY EVALUATION

By letter dated August 23, 1976 from Mr. Robert W. Reid to Mr. William J. Cahill, Jr., the NRC Regulatory Staff requested technical specification changes that would establish secondary water chemistry limiting conditions for operation (LCOs) and surveillance, requirements. This generic matter was the subject of a September 10, 1976 meeting among representatives of various utility companies, Westinghouse Electric Corporation and the Regulatory Staff. The consensus of attendees was that the format of the NRC model technical specifications, establishing LCOs for secondary water chemistry, was not appropriate and that specifications establishing a long-term reliability surveillance program with record keeping and review requrirements would be appropriate.

Accordingly, we and our NSSS vendor (Westinghouse) developed such a surveillance program for Indian Point Unit No. 2. Our application for Amendment to Operating License, dated March 21, 1978, proposed changes in the Technical Specifications to implement this program.

By letter dated August 1, 1979 from Mr. A Schwencer to Mr. William J. Cahill, Jr., the NRC Regulatory Staff cancelled the proposed Technical Specifications and requested an Operating License Revision to incorporate a Model License Condition. The proposed Facility Operating License Revisions incorporated in Attachment A satisfy that request. The proposed changes would establish requirements in the Operating License to implement a secondary water chemistry monitoring program. This program is consistent with AVT secondary water chemistry control utilized at Indian Point Unit No. 2 and will effectively monitor impurities in the secondary water system thereby assuring the long-term integrity of steam generator tubing.

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 Nuclear Facilities Safety Committee. The committee concurs 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.

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of
CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.
(Indian Point Station,
Unit No. 2)
STATE OF NEW YORK)

COUNTY OF NEW YROK)

Docket No. 50-247

AFFIDAVIT OF SERVICE

ss:

Martin J. Scott, being duly sworn, states: That he is an Engineer employed by Consolidated Edison Company of New York, Inc., and that he has served the foregoing document entitled, "Application for Amendment to Operating License," sworn to on October 1, 1979, by mailing two (2) copies thereof, first class postage prepaid and properly addressed to the following person:

> Hon. George V. Begany Mayor, Village of Buchanan 188 Westchester Avenue Buchanan, New York 10511

Subscribed and sworn to before me this / 2 day of October, 1979.

Notary Public

ANGELA ROBERTI Notary Public, State of New York No. 41-8593813 Qualified in Queens County Commission Expires March 30, 1980