

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
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May 5, 1982



Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

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

Dear Mr. Varga:

Consolidated Edison Company of New York, Inc. transmits herewith three (3) signed originals and forty (40) copies of the document entitled "Application for Amendment to Operating License", sworn to on May 5, 1982. The proposed technical specification changes, contained in Attachment A to this Application, would incorporate revised reactor coolant system heatup, cooldown and hydrostatic test pressure/temperature limitations applicable through seven (7) effective full power years (EFPYs) of reactor operation. The present technical specification limitations are applicable only through 5 EFPYs of reactor operation. A Safety Evaluation of the proposed revisions is presented in Attachment B to this Application.

Transmitted herewith are twenty (20) copies of a document entitled, "Reactor Vessel Material Surveillance Program for Indian Point Unit No. 2 Analysis of Capsule Y," dated November 1980. This document is referenced in Attachment B of this Application and is the supporting document for the development of the 7 EFPY heatup and cooldown curves. Also transmitted herewith for information are twenty (20) copies of a document entitled, "Reactor Vessel Material Surveillance Program for Indian Point Unit No. 2 Analysis Capsule T-Supplement to Final Report," dated December 1980.

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We respectfully request your expeditious review of this Application since, based on a present projection of plant operation, 5 EFPYs could be achieved as early as June 21, 1982.

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In accordance with 10 CFR 170.22, this Application qualifies as a "Class III" Amendment. Accordingly, as required by 10 CFR 170.22, enclosed is a check in the amount of \$4,000.00 as the total filing fee for this Application. This payment is being made under protest, and Consolidated Edison reserves the right to challenge the validity of the imposition of these fees, and the basis for the determination of the amounts of the fees.

An Affidavit of Service is enclosed.

Very truly yours,

William P. Bennett
for John D. O'Keefe

cc: (w/encl.)
Hon. F. Webster Pierce