

ATTACHMENT A

AMENDMENT NO. 1 TO
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
June, 1984

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LIMITING CONDITIONS FOR OPERATION

- 3.0.1 In the event a Limiting Condition for Operation (LCO) and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in at least hot shutdown within the next 7 hours, and in at least cold shutdown within the following 30 hours unless corrective measures are completed that restore compliance to the LCO within these time intervals as measured from initial discovery or until the reactor is placed in a condition in which the LCO is not applicable. Exceptions to these requirements shall be stated in the individual specifications.
- 3.0.2 A system, subsystem, train, component or device shall not be considered inoperable solely because its normal power source is inoperable, or solely because its emergency power source (i.e., diesel, battery) is inoperable. In such instances the equipment served by the inoperable power source shall be considered operable for purposes of compliance with their individual equipment LCOs and only the LCO for the inoperable power source shall apply.

3.1 Reactor Coolant System

Applicability

Applies to the operating status of the Reactor Coolant System.

Objective

To specify those limiting conditions for operation of the Reactor Coolant System which must be met to ensure safe reactor operation.

A. Operational Components

1. Coolant Pumps

- a. Except as noted in 3.1.A.1.b. below, four reactor coolant pumps shall be in operation during power operation.
- b. During power operation, one reactor coolant pump may be out of service for testing or repair purposes for a period not to exceed four hours.
- c. During shutdown conditions with fuel in the reactor, the operability requirements for reactor coolant and/or residual heat removal pumps specified in Table 3.1.A-1 shall be met.

- d. When RCS temperature is less than or equal to 310°F, the requirements of Specification 3.1.A.4 regarding startup of a reactor coolant pump with no other reactor coolant pumps operating shall be adhered to.

2. Steam Generators

Two steam generators shall be capable of performing their heat transfer function whenever the reactor coolant system is above 350°F.

ATTACHMENT B

AMENDMENT NO. 1 TO
APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
Facility Operating License No. DPR-26
June, 1984

SAFETY ASSESSMENT

The proposed technical specification revisions, contained in Attachment A to this Application, are in response to a November 15, 1983 letter from NRC concerning Limiting Conditions for Operation (LCOs) for multiple outages of redundant components and the use of the term "Operable" as it applies to the single failure criterion for safety systems in power reactors. A previous license amendment request clarifying the definition of operability consistent with the definition provided with NRC's April 10, 1980 letter was submitted by Consolidated Edison's Application dated February 14, 1983.

The changes proposed in paragraph 3.0.1 are consistent with those requested by NRC and are intended to clarify the action required in the event that the plant is determined to be in a condition in excess of or less conservative than, permitted by the applicable limiting condition for operation (LCO) contained in the Technical Specifications. The action times and the plant operating conditions that must be obtained under this provision differ somewhat from those contained in the NRC model Technical Specifications. Where the model calls for the unit to be put in hot standby within 1 hour and in hot shutdown within the next six hours, the proposed specification combines these actions into a single requirement to place the unit in hot shutdown within seven hours. This approach permits a controlled power reduction utilizing normal operating procedures in order to minimize stress to plant equipment as well as any negative effects on the off-site system associated with the rapid (1-hr) power reduction suggested in the model. In addition to reducing stresses to plant and off-site systems and equipment, this approach provides greater flexibility for assessing plant conditions and developing corrective actions such that for certain types of occurrences, the need for a plant evolution, with attendant challenges to safety systems (which may not be available) may be avoided. The combination of action times and operating conditions specified will provide a level of conservatism consistent with that recommended by NRC. Specifically, the total time proposed to reach cold shutdown (37 hours) is identical to that suggested in the model Technical Specifications.

The changes proposed in paragraph 3.0.2 clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, explicitly identifying the LCO for the inoperable power source as the applicable LCO, rather than the individual equipment LCOs. This change is necessary in view of the implications of the proposed change to the definition of operability contained in our February 14, 1983 license amendment application (i.e., that all necessary instrumentation, controls, electrical power sources, etc. required for the equipment to perform its safety function(s) are also capable of performing their related support functions). Absent this clarification, the proposed change to the definition of operability would suggest the application of the individual equipment LCOs whenever the normal or emergency power sources for that equipment are determined to be inoperable. The proposed change, together with the provisions of existing Technical Specification paragraph 3.7.B will prohibit continuing plant operation when one train of safety-related systems is "inoperable"

because its normal or emergency power source is inoperable and redundant equipment in another train is inoperable for another reason. This change is consistent with the provisions of paragraph 3.0.5 of the Standard Technical Specifications contained in NRC's April 10, 1980 letter.

The provisions of paragraph 3.0.5 of the STS which are not addressed in paragraph 3.0.2 of the proposed Technical Specification change relate to the conditions under which the provisions of the paragraph may be applied, i.e., "(1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification", as well as the action times specified if these conditions are not met. Existing Indian Point Unit No. 2 Technical Specification 3.7.B. already stipulates the equivalent conditions and action times, thus no further changes are necessary.

Basis for no significant hazards consideration determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "...a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, for example, a more stringent surveillance requirement." The changes proposed in this license amendment application are encompassed by this example in that the proposed changes would: (1) add restrictions on the actions required when plant operation is determined to be in excess of or less conservative than the LCO requirements, an area in which no previous specification existed, and (2) clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, another area in which no previous specification existed.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, we have determined that the application involves no significant hazards consideration.

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.

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

Amendment No. 1 To
APPLICATION FOR AMENDMENT TO
OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Consolidated Edison"), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A to that License. Specifically, Consolidated Edison requests that Indian Point Unit No. 2 Technical Specification 3.0 be revised to: (1) specify the action required when a limiting condition for operation is exceeded and (2) clarify the applicability of the ICOS involved when either normal or emergency power sources for safety-related equipment are inoperable. These clarifications are in response to an NRC letter dated November 15, 1983 commenting on portions of Consolidated Edison's February 14, 1983 license amendment application.

The specified proposed Technical Specification page revisions are set forth in Attachment A to this Application and supersede the corresponding page revisions contained in Consolidated Edison's February 14, 1983 license amendment application. A Safety Assessment of the impact of the proposed changes is set forth in Attachment B to this Application. This

Assessment demonstrates that the proposed changes do not represent a significant hazards consideration as defined in 10 CFR 50.92(c) and will not cause any change in the types or an 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: John D. O'Toole

John D. O'Toole
Vice President

Subscribed and sworn to
before me this 21 day
of June, 1984.

Thomas Love
Notary Public

THOMAS LOVE
Notary Public, State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1985

ATTACHMENT A

AMENDMENT NO. 1 TO
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
June, 1984

3. LIMITING CONDITIONS FOR OPERATION

3.0.1 In the event a Limiting Condition for Operation (LCO) and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in at least hot shutdown within the next 7 hours, and in at least cold shutdown within the following 30 hours unless corrective measures are completed that restore compliance to the LCO within these time intervals as measured from initial discovery or until the reactor is placed in a condition in which the LCO is not applicable. Exceptions to these requirements shall be stated in the individual specifications.

3.0.2 A system, subsystem, train, component or device shall not be considered inoperable solely because its normal power source is inoperable, or solely because its emergency power source (i.e., diesel, battery) is inoperable. In such instances the equipment served by the inoperable power source shall be considered operable for purposes of compliance with their individual equipment LCOs and only the LCO for the inoperable power source shall apply.

3.1 Reactor Coolant System

Applicability

Applies to the operating status of the Reactor Coolant System.

Objective

To specify those limiting conditions for operation of the Reactor Coolant System which must be met to ensure safe reactor operation.

A. Operational Components

1. Coolant Pumps

a. Except as noted in 3.1.A.1.b. below, four reactor coolant pumps shall be in operation during power operation.

b. During power operation, one reactor coolant pump may be out of service for testing or repair purposes for a period not to exceed four hours.

c. During shutdown conditions with fuel in the reactor, the operability requirements for reactor coolant and/or residual heat removal pumps specified in Table 3.1.A-1 shall be met.

- d. When RCS temperature is less than or equal to 310°F, the requirements of Specification 3.1.A.4 regarding startup of a reactor coolant pump with no other reactor coolant pumps operating shall be adhered to.

2. Steam Generators

Two steam generators shall be capable of performing their heat transfer function whenever the reactor coolant system is above 350°F.

ATTACHMENT B

AMENDMENT NO. 1 TO
APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
Facility Operating License No. DPR-26
June, 1984

SAFETY ASSESSMENT

The proposed technical specification revisions, contained in Attachment A to this Application, are in response to a November 15, 1983 letter from NRC concerning Limiting Conditions for Operation (LCOs) for multiple outages of redundant components and the use of the term "Operable" as it applies to the single failure criterion for safety systems in power reactors. A previous license amendment request clarifying the definition of operability consistent with the definition provided with NRC's April 10, 1980 letter was submitted by Consolidated Edison's Application dated February 14, 1983.

The changes proposed in paragraph 3.0.1 are consistent with those requested by NRC and are intended to clarify the action required in the event that the plant is determined to be in a condition in excess of or less conservative than, permitted by the applicable limiting condition for operation (LCO) contained in the Technical Specifications. The action times and the plant operating conditions that must be obtained under this provision differ somewhat from those contained in the NRC model Technical Specifications. Where the model calls for the unit to be put in hot standby within 1 hour and in hot shutdown within the next six hours, the proposed specification combines these actions into a single requirement to place the unit in hot shutdown within seven hours. This approach permits a controlled power reduction utilizing normal operating procedures in order to minimize stress to plant equipment as well as any negative effects on the off-site system associated with the rapid (1-hr) power reduction suggested in the model. In addition to reducing stresses to plant and off-site systems and equipment, this approach provides greater flexibility for assessing plant conditions and developing corrective actions such that for certain types of occurrences, the need for a plant evolution; with attendant challenges to safety systems (which may not be available) may be avoided. The combination of action times and operating conditions specified will provide a level of conservatism consistent with that recommended by NRC. Specifically, the total time proposed to reach cold shutdown (37 hours) is identical to that suggested in the model Technical Specifications.

The changes proposed in paragraph 3.0.2 clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, explicitly identifying the LCO for the inoperable power source as the applicable LCO, rather than the individual equipment LCOs. This change is necessary in view of the implications of the proposed change to the definition of operability contained in our February 14, 1983 license amendment application (i.e., that all necessary instrumentation, controls, electrical power sources, etc. required for the equipment to perform its safety function(s) are also capable of performing their related support functions). Absent this clarification, the proposed change to the definition of operability would suggest the application of the individual equipment LCOs whenever the normal or emergency power sources for that equipment are determined to be inoperable. The proposed change, together with the provisions of existing Technical Specification paragraph 3.7.B will prohibit continuing plant operation when one train of safety-related systems is "inoperable"

because its normal or emergency power source is inoperable and redundant equipment in another train is inoperable for another reason. This change is consistent with the provisions of paragraph 3.0.5 of the Standard Technical Specifications contained in NRC's April 10, 1980 letter.

The provisions of paragraph 3.0.5 of the STS which are not addressed in paragraph 3.0.2 of the proposed Technical Specification change relate to the conditions under which the provisions of the paragraph may be applied, i.e., "(1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification", as well as the action times specified if these conditions are not met. Existing Indian Point Unit No. 2 Technical Specification 3.7.B. already stipulates the equivalent conditions and action times, thus no further changes are necessary.

Basis for no significant hazards consideration determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870): The examples of actions involving no significant hazards consideration include: "...a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, for example, a more stringent surveillance requirement." The changes proposed in this license amendment application are encompassed by this example in that the proposed changes would: (1) add restrictions on the actions required when plant operation is determined to be in excess of or less conservative than the LCO requirements, an area in which no previous specification existed, and (2) clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, another area in which no previous specification existed.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, we have determined that the application involves no significant hazards consideration.

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.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

Amendment No. 1 To
APPLICATION FOR AMENDMENT TO
OPERATING LICENSE

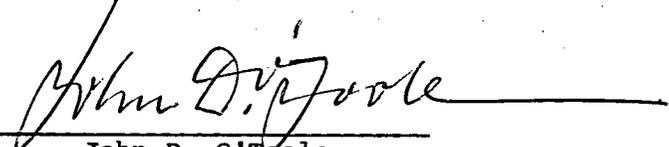
Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Consolidated Edison"), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A to that License. Specifically, Consolidated Edison requests that Indian Point Unit No. 2 Technical Specification 3.0 be revised to: (1) specify the action required when a limiting condition for operation is exceeded and (2) clarify the applicability of the LCOs involved when either normal or emergency power sources for safety-related equipment are inoperable. These clarifications are in response to an NRC letter dated November 15, 1983 commenting on portions of Consolidated Edison's February 14, 1983 license amendment application.

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Assessment demonstrates that the proposed changes do not represent a significant hazards consideration as defined in 10 CFR 50.92(c) and will not cause any change in the types or an increase in the amounts of effluents or any change in the authorized power level of the facility.

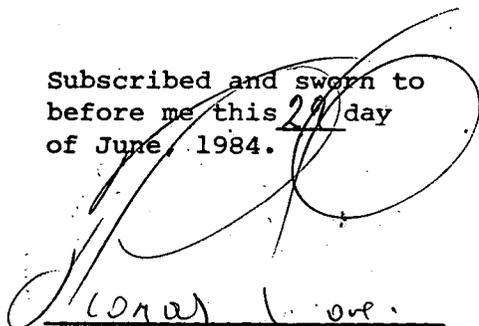
CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.

By:



John D. O'Toole
Vice President

Subscribed and sworn to
before me this 29 day
of June, 1984.



Notary Public
THOMAS LOVE

Notary Public, State of New York
No. 31-2409638

Qualified in New York County

Commission Expires March 30, 1985

ATTACHMENT A

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Indian Point Unit No. 2
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Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
Facility Operating License No. DPR-26
June, 1984

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The changes proposed in paragraph 3.0.2 clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, explicitly identifying the LCO for the inoperable power source as the applicable LCO, rather than the individual equipment LCOs. This change is necessary in view of the implications of the proposed change to the definition of operability contained in our February 14, 1983 license amendment application (i.e., that all necessary instrumentation, controls, electrical power sources, etc. required for the equipment to perform its safety function(s) are also capable of performing their related support functions). Absent this clarification, the proposed change to the definition of operability would suggest the application of the individual equipment LCOs whenever the normal or emergency power sources for that equipment are determined to be inoperable. The proposed change, together with the provisions of existing Technical Specification paragraph 3.7.B will prohibit continuing plant operation when one train of safety-related systems is "inoperable"

because its normal or emergency power source is inoperable and redundant equipment in another train is inoperable for another reason. This change is consistent with the provisions of paragraph 3.0.5 of the Standard Technical Specifications contained in NRC's April 10, 1980 letter.

The provisions of paragraph 3.0.5 of the STS which are not addressed in paragraph 3.0.2 of the proposed Technical Specification change relate to the conditions under which the provisions of the paragraph may be applied, i.e., "(1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification", as well as the action times specified if these conditions are not met. Existing Indian Point Unit No. 2 Technical Specification 3.7.B. already stipulates the equivalent conditions and action times, thus no further changes are necessary.

Basis for no significant hazards consideration determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "...a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, for example, a more stringent surveillance requirement." The changes proposed in this license amendment application are encompassed by this example in that the proposed changes would: (1) add restrictions on the actions required when plant operation is determined to be in excess of or less conservative than the LCO requirements, an area in which no previous specification existed, and (2) clarify the applicability of the LCOs involved when either the normal or emergency power sources for safety-related equipment are inoperable, another area in which no previous specification existed.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

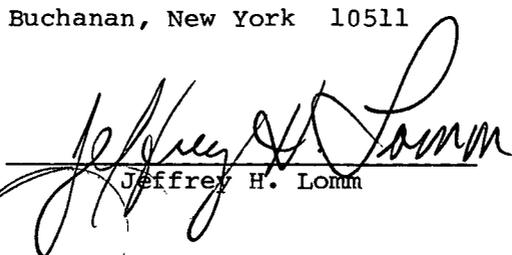
AFFIDAVIT OF SERVICE

Jeffrey H. Lomm, being duly sworn, states:

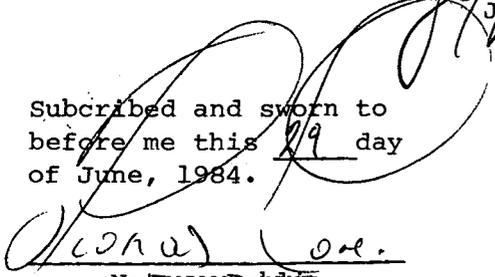
That he is a Senior Engineer employed by Consolidated Edison Company of New York, Inc., and that he has served the foregoing document, sworn to on June 29, 1984, entitled "Amendment No. 1 to Application for Amendment to Operating License" by mailing copies thereof, first class postage prepaid and properly addressed to the following persons:

Jay Dunkleberger
Division of Policy Analysis and Planning
New York State Energy Office
Agency Building 2, Empire State Plaza
Albany, New York 12222

Hon. Cheryl Harding
Mayor, Village of Buchanan
236 Tate Avenue
Buchanan, New York 10511



Jeffrey H. Lomm


Subscribed and sworn to
before me this 29 day
of June, 1984.

Notary Public

Notary Public, State of New York
No. 31-2409638

Qualified in New York County
Commission Expires March 30, 1985