

ATTACHMENT A

Technical Specification  
Page Revisions

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
July, 1985

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### 1.8 Quadrant Power Tilt Ratio

The quadrant power tilt ratio shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

### 1.9 Surveillance Intervals

Unless otherwise noted in an individual surveillance requirement, surveillance intervals shall be as specified in Table 1-1 with extensions as provided in 1.10 below. The extensions provided in 1.10 below also apply to surveillance intervals not listed in Table 1-1 unless the extensions are specifically not allowed.

### 1.10 Surveillance Interval Maximums

Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and

A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.\*

### 1.11 PRESSURE BOUNDARY LEAKAGE

PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a non-isolatable fault in a Reactor Coolant System component body, pipe wall or vessel wall.

### 1.12 IDENTIFIED LEAKAGE

IDENTIFIED LEAKAGE SHALL BE:

- a. Reactor coolant system leakage into closed systems such as pump seal or valve packing leaks that are captured and conducted to a collecting tank, or
- b. Reactor coolant system leakage through a steam generators to the secondary system, or
- c. Reactor coolant system leakage through the RCS/RHR pressure isolation valves, or

\* There shall be a one-time only exemption for surveillance requirements listed in Table 1 of the letter from John D. O'Toole to Steven A. Varga dated July 31, 1985. The 3.25 maximum combined interval may be extended to permit tests and calibrations to be performed prior to startup from the Cycle 7/8 refueling outage.

ATTACHMENT B

Safety Assessment

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
July, 1985

## Safety Assessment

### Description of Change and Evaluation:

The Technical Specifications (TSS) require a number of surveillance tests to be performed about once every 18 months during a refueling outage. The TSS also include a provision which permits any surveillance interval to be extended by 25% of the nominal interval (18 months) provided that the total time interval does not exceed 3.25 times the specified surveillance interval over three consecutive surveillance intervals. During the last three (3) consecutive fuel cycles Indian Point Unit No. 2 (IP-2) incurred two extended outages due to unplanned events and a long fuel cycle because of occasional reactor shutdowns and extended low power operation. The cumulative result of these events is that some surveillance testing, normally performed at 18 month intervals during a refueling outage, becomes due before the next scheduled refueling outage. Therefore, it has become necessary to request, on a one-time basis, an extension to the "3.25 limit" for the surveillance requirements listed in Table 1 attached to the forwarding letter for this application. This extension will allow the listed surveillance requirements to be performed during the next refueling outage and prevent a plant shutdown and cycling solely to perform the surveillance tests, thus, providing added insurance of continuous operation of Indian Point Unit No. 2 for the duration of the present fuel cycle and minimizing the cost of replacement power and the ultimate cost to the consumer.

The proposed change temporarily revises Technical Specification Section 1.10.a by adding a footnote which reads: "There shall be a one-time only exemption for surveillance requirements listed in Table 1 of the letter from John D. O'Toole to Steven A. Varga dated July 31, 1985. The 3.25 maximum combined interval may be extended to permit tests and calibrations to be performed prior to startup from the Cycle 7/8 refueling outage."

According to the guidance contained in Generic Letter 83-27 entitled "Surveillance Intervals in Standard Technical Specifications", the 18 month surveillance interval is based on reactor operating experience and recognition of reactors utilizing 18 month fuel cycles. The basis for the provision which allows any surveillance interval to be extended by 25% is to provide the necessary operational flexibility which may be required due to scheduling and operational performance considerations. Also, as indicated in Generic Letter 83-27, NRC recognized that exceptions to the Technical Specifications surveillance interval requirements would be necessary and granted where adequate justification is given. For reasons discussed above, an extension to the "3.25 limit" has become necessary to prevent an unnecessary plant shutdown.

If the proposed technical specification change were to go into effect and the subject surveillance tests performed during the next refueling outage, in each instance the test would be performed within the allowable existing permissible technical specification interval between any two tests, e.g., 18 months plus 25%. The results of the previous surveillance tests were evaluated and show that there is no reason to expect significant safety-related component failures during the extended surveillance interval. Thus, assurance that the quality of the component and its ability to perform will be maintained during the extension period is at least equivalent to that level currently provided by the technical specification for a maximum surveillance interval (i.e., 18 months plus 25%). The evaluation considered the potential impact that prior tests failures would have on the licensing basis of IP-2 and concluded that due to the redundancy and diversity of the reactor protection system and engineered safety features actuation system, there is no significant reduction in the overall reliability of IP-2 protection systems associated with the extension of the surveillance interval. Hence, the requested extension of the 3.25 limit does not involve a significant reduction in a margin of safety and will not compromise the health and safety of the public.

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). Example (vi) of those involving no significant hazards considerations discusses a change which may reduce a safety margin but where the results are clearly within all acceptable criteria with respect to the system or component. The proposed modification to extend the 3.25 surveillance interval limit over three consecutive intervals is in a less restrictive direction and would appear to reduce a safety margin. However, consistent with the Commission's criteria for determining whether a proposed amendment to an operating license involves no significant hazard consideration, 10 CFR 50.92 (48 FR 14870), we have similarly determined that the proposed change will not increase the probability or the consequences of an accident previously evaluated, or create the possibility of a new or different kind of an accident from any previously evaluated, or involve a significant reduction in a margin of safety.

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 change has been reviewed by the Indian Point Unit No. 2 Station Nuclear Safety Committee and the Consolidated Edison Nuclear Facility Safety Committee. Both committees concur that this change does 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.

MEMORANDUM FOR: M. Slossen, Project Manager, DL

FROM: William O. Miller, Chief, LFMB, ADM

SUBJECT: FEE EXEMPT REACTOR APPLICATION FOR LICENSE AMENDMENT OR OTHER APPROVAL

This memorandum pertains to the following application:

Application Date: 7/31/84 Assigned TAC#: 56131 License#: DPR-26

Applicant: Consolidated Edison Company of New York

Plant Name and Unit: Indian Point 2

The above-identified application which you have specified is exempt from fees has been reviewed by the LFMB staff and found to be questionable as an application exempt from the fee requirements of 10 CFR 170. Please inform us by use of the following items, or by a separate memorandum, your basis for your exempt position. If additional space is needed, the reverse side of this memorandum may be used.

William O. Miller, Chief, LFMB

TAC  
56131

1.  was approved by Order dated 7/8/85 issued pursuant to 10 CFR 2.204.
2.  results specifically from the 2.204 Order dated \_\_\_\_\_.
3.  was issued to simplify or clarify the license or Technical Specifications at NRC's request and solely for NRC's convenience.
4.  was (state other reason) \_\_\_\_\_

The above application was approved on \_\_\_\_\_ by Amendment No. \_\_\_\_\_ or by letter, etc.

Date: 7-29-85

Signature: Mary M Slossen  
(Project Manager or Branch Chief)

LFMB determination on the above exemption:

1.  LFMB agrees that the above application is exempt.
2.  LFMB does not view this application as being exempt because it:
  - a. Does not appear to specifically result from the Order dated \_\_\_\_\_ because: \_\_\_\_\_

Please provide (on reverse side or by separate memo) data to support your position.

b. Other reason: \_\_\_\_\_

OK  
SOS  
7/31/85

W. O. Miller

Signature: W. O. Miller (LFMB)

Date: 7/31/85