

ATTACHMENT A

Technical Specification
Page Revisions

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

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3.8 REFUELING

Applicability

Applies to operating limitations during refueling operations.

Objective

To ensure that no incident could occur during refueling operations that would adversely affect public health and safety.

Specification

- A. During refueling operations, the following conditions shall be satisfied:
1. The equipment door, or a closure plate that restricts direct air flow from the Containment, and at least one personnel door in the equipment door or closure plate and in the personnel air lock shall be properly closed. In addition, at least one isolation valve shall be operable or locked closed in each line penetrating the containment and which provides a direct path from containment atmosphere to the outside.
 2. Radiation levels in the containment and spent fuel storage areas shall be monitored continuously.
 3. The core subcritical neutron flux shall be continuously monitored by the two source range monitors, each with continuous visual indication in the control room and one with audible indication in the containment available whenever core geometry is being changed. When core geometry is not being changed, at least one source range neutron flux monitor shall be in service.

ATTACHMENT B

Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
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Safety Assessment

The proposed technical specification revision contained in Attachment A to this Application would modify the Indian Point Unit No. 2 Technical Specifications to include a provision for utilizing a temporary closure plate in place of the equipment door during refueling.

The current Technical Specifications require that the equipment door and at least one door in each personnel air lock be properly closed during refueling. This requirement has been imposed even though the analysis for a fuel handling accident inside containment takes no credit for containment isolation or filtration of effluents prior to release.

During refueling operations the reactor is cooled below 140°F, is depressurized and open to the containment and is flooded with additional water from the refueling water storage tank. Under these conditions there is no potential for a rapid release of energy to the containment which might cause an increase in pressure. With no potential for a rapid release of energy, there is no need during refueling for closures designed to withstand accident pressure. The temporary closure will be seismically designed, but it will not be designed to withstand high pressure. The temporary closure plate will perform the required functions, i.e., provide additional margin for a fuel handling accident by restricting direct communication with the environment and provide a seismic envelope to restrict the potential escape of radioactivity resulting from seismic events during refueling.

Section 3/4.9.4 in the NRC's Standard Technical Specifications for Westinghouse PWR's require that the equipment door be held in place by a minimum of four bolts and that penetrations providing direct access from the containment atmosphere to the outside atmosphere be closed or capable of automatic closure. Clearly the intent is that direct air flow to the environment be restricted but that the containment need not be in a condition to mitigate design basis accidents. The proposed change will conform to this guidance.

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 provision to include the use of a temporary closure plate during refueling 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 considerations, 10 CFR 50.92 (48 FR 871), we have determined that the proposed provision to include the use of a temporary closure plate during refueling 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 this application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, we have determined that this application involves no significant hazards consideration.

The proposed changes have been reviewed by both 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 the amounts of effluents or any change in the authorized power level of the facility.