John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

August 6, 1985

Re: Indian Point Unit No. 2
Docket No. 50-247

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

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 August 6, 1985. This application is in response to NRC letters dated September 29, 1983 and June 17, 1985 concerning containment venting and purging (multiplant action item B-24 and NUREG-0737, Item II.E.4.2.5). The proposed changes would modify the Indian Point Unit No. 2 Technical Specification to limit further the use of the containment purge and vent isolation valves during power operation and clarify associated requirements in Specification 3.6 relating to the application of containment isolation action statements.

The text of the requested changes is contained in Attachment A to this Application. A Safety Assessment justifying the proposed changes and concluding that this amendment request does not involve a significant hazards consideration is contained in Attachment B to this application. Justification for those items requested which are not addressed in this Application is contained in Attachment C.

Notwithstanding the changes proposed in this application, our July 25, 1982 commitment to establish an adminstrative goal for purging of less than 90 hours per year during power operation, and limiting the use of the 36" containment purge valves to as low as achievable when above cold shutdown, will remain in full force and effect. Our commitment to limit use of the 10" pressure relief line isolation valves to a duration sufficient to maintain containment pressure below the Technical Specification requirements for the high containment pressure safety injection signal setpoint also remains in full force and effect.

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With regard to the need for a replacement program for seat ring seals on the purge and vent valves, Con Edison will initiate a maintenance program which will include periodic seal replacement on a frequency consistent with the valve manufacturer's recommendations. The program will commence following startup from the next refueling outage.

In accordance with 10 CFR 170.22, a check in the amount of $150.00 is enclosed as the required application fee for this amendment. An Affidavit of Service attesting to state notification as required by 10 CFR 50.91 is attached.

Should you or your staff have any questions please contact us.

Very truly yours,

John D. O'Toole
Vice President

encl.
cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

Mr. Jay Dunkelberger
Division of Policy Analysis and Planning
New York State Energy Office
Agency Buidling 2, Empire State Plaza
Albany, New York 12223

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

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

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 August , 1985, entitled "Application for Amendment to Operating License" by mailing copies thereof, first class, postage prepaid and properly addressed to the following persons:

Mr. Jay Dunkerlberger
Division of Policy Analysis and Planning
New York State Energy Office
Agency Building 2, Empire State Plaza
Albany, New York 12223

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

Jeffrey H. Lomm

Subscribed and sworn to
before me this 6 day
August, 1985.

Notary Public

Notary Public, State of New York
No. 31-2409638
Qualified in New York County
Commission Expires March 30, 1987