

ATTACHMENT A

Technical Specification
Page Revisions

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
December, 1986

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4. Surveillance Requirements

4.1 Operational Safety Review

Applicability

Applies to items directly related to safety limits and limiting conditions for operation.

Objective

To specify the minimum frequency and type of surveillance to be applied to plant equipment and conditions.

Specification

- a. Calibration, testing and checking of analog channels, and testing of logic channels shall be performed as specified in Table 4.1-1.
- b. Sampling and equipment tests shall be conducted as specified in Tables 4.1-2 and 4.1-3, respectively.
- c. Performance of any surveillance test outlined in these specifications is not immediately required if the plant condition is the same as the condition into which the plant would be placed by an unsatisfactory result of that test. Such tests will be performed before the plant is removed from the subject condition that has precluded the immediate need to run the test. If the test provisions require that a minimum higher system condition must first be established, the test will be performed promptly upon achieving this minimum condition. The following surveillance tests, however, must be performed without the above exception:
 - o Table 4.1-1 Items 3 and 19
 - o Table 4.1-2 Items 1, 2, and 10
 - o Table 4.1-3 Items 2, 6

Basis

A surveillance test is intended to identify conditions in a plant that would lead to a degradation of reactor safety. Should a test reveal such a condition, the Technical Specifications require that either immediately, or after a specified period of time, the plant be placed in a condition which mitigates or eliminates the consequences of additional related casualties or accidents. If the plant is already in a condition which satisfies the failure criteria of the test, then plant safety is not compromised and performance of the test yields information that is not necessary to determine safety limits or limiting conditions for operation of the plant. The surveillance test need not be performed, therefore, as long as the plant remains in this condition. However, this surveillance test should be performed prior to removing the plant from the subject condition that has precluded the immediate need to run the

TABLE 4.1-3 (1 of 1)

FREQUENCIES FOR EQUIPMENT TESTS

	<u>Check</u>	<u>Frequency</u>	<u>Maximum Time Between Tests</u>
1. Control Rods	Rod drop times of all control rods	Each refueling shutdown	**
2. Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations	**
3. Pressurizer Safety Valves	Set point	Each refueling shutdown	**
4. Main Steam Safety Valves	Set point	Each refueling shutdown	**
5. Containment Isolation System	Automatic Actuation	Each refueling shutdown	**
6. Refueling System Interlocks	Functioning	Each refueling shutdown prior to refueling operation	Not Applicable
7. Diesel Fuel Supply	Fuel Inventory	Weekly	10 days
8. Turbine Steam Stop, Control Valves	Closure	Monthly****	45 days****
9. Cable Tunnel Ventilation Fans	Functioning	Monthly	45 days

**See Specification 1.9.

****This test may be waived during end-of-cycle operation when reactor coolant boron concentration is equal to or less than 150 ppm, due to operational limitations.

Amendment No

ATTACHMENT B

Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
December, 1986

Safety Assessment

Discussion

The proposed revisions to Technical Specification Table 4.1-3, contained in Attachment A to this Application, would modify the Technical Specifications using provisions regarding surveillance intervals for control rod movement contained in the Standard Technical Specifications (STS) for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 4.

Currently, the Technical Specifications require surveillance tests of all control rods for "partial movement". The proposed change would specify control rod movement of at least 10 steps in any one direction, thus clarifying the minimum number of steps required to assure control rod freedom of movement.

The proposed Technical Specification changes also provide for testing of control rod movement on a 31 day frequency with the maximum time between tests referenced to IP-2 Technical Specification 1.9, which specifies that:

- a. A maximum allowable extension is not to exceed 25% of the surveillance interval, and
- b. A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

The proposed change from a nominal two-week surveillance interval to a nominal 31 day surveillance interval would reduce the mechanical wear on rod drive mechanisms, and reduce the wear on rod control cluster cladding caused by more frequent rod insertions. Likewise, since initial plant startup of Indian Point Unit No. 2, we have never experienced a control rod which has failed to go to the fully inserted position when required, nor have we found an immovable control rod during movement exercises. Based upon industry experience and our own experience at IP-2, there is no reason to believe that the frequency of control rod failure to move upon demand would increase in the 15 to 31 day additional surveillance period as proposed, and in fact failure frequency may decline due to the reduced equipment wear described above. Thus, a 31 day surveillance interval remains conservative and is consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors in providing assurance of control rod movement capability.

In addition to the aforementioned Technical Specification changes, some purely administrative changes are requested to achieve consistency throughout the technical specifications. In Table 4.1-3, equipment test numbers 7, 11 and 12, which have previously been deleted, would be omitted from the table. This renumbers equipment tests 8, 9 and 10 to be 7, 8, and 9 respectively. Correspondingly, references to items 11 and 12 have been deleted from specification 4.1 as well. Also in Table 4.1-3, the reference to "NA" in equipment test number 6 would be changed to "Not Applicable" which omits the need for the "NA" footnote. Finally, the appropriate titles for section 4 and 4.1 had previously been missing from page 4.1-1 due to copying errors and are now being added as listed in the table of contents.

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 appear to reduce a safety margin but where the results are clearly within all acceptable criteria with respect to the system or component. The proposed change to the surveillance requirement for control rod movement is in a less conservative direction and would appear to reduce a safety margin. However, consistent with the Commission's criteria in 10 CFR 50.92 (48 FR 14871), we have determined that the proposed change does not involve a significant hazards consideration because the operation of Indian Point Unit No. 2 in accordance with this change would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change does not entail any physical changes in plant equipment. The proposed change remains conservative based on industry experience in using a 31 day surveillance frequency dictated by the STS and on our own operating experience in assuring control rod movement capabilities. The proposed revision also enhances the reliability of control rod movement by decreasing wear on rod drive mechanisms. Therefore, this change will not increase the probability or consequences of an accident.
- (2) create the probability of a new or different kind of accident from any accident previously evaluated, since the proposed change would not alter the configuration of any of the plant's equipment and remains conservative in providing assurance of control rod movement capability.
- (3) involve a significant reduction in a margin of safety, since the proposed change remains conservative for the surveillance of control rod movement.

Therefore, based on the above considerations, we conclude that the proposed changes does not constitute a significant hazards consideration.

The proposed changes have been reviewed by Consolidated Edison's Station Nuclear Safety Committee and Nuclear Facilities 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.