ATTACHMENT A

Technical Specification
Page Revisions

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
May 1987

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3.4 STEAM AND POWER CONVERSION SYSTEM

Applicability

Applies to the operating status of the Steam and Power Conversion System.

Objective

To define conditions of the turbine cycle steam-relieving capacity. Auxiliary Feedwater System and City Water System operation is necessary to ensure the capability to remove decay heat from the core.

Specification

- A. The reactor shall not be heated above $350^{\circ}\mathrm{F}$ unless the following conditions are met:
 - (1) A minimum ASME code approved steam relieving capability of twenty (20) main steam valves shall be operable (except for testing). With up to three (per steam generator) of the twenty main steam line code-approved safety relief valves inoperable, heat-up above 350°F and power operation is permissible provided either the inoperable valve(s) is restored to operable status or the Power Range Neutron Flux High Trip Setpoint is reduced per Table 3.4-1.
 - (2) Three auxiliary feedwater pumps, each capable of pumping a minimim of 300 gpm, must be operable.
 - (3) A minimum of 360,000 gallons of water in the condensate storage tank and a backup supply from the city water supply.
 - (4) Required system piping, valves, and instrumentation directly associated with the above components operable.
 - (5) The main steam stop valves are operable and capable of closing in five seconds of less.
 - (6) The total iodine activity of I-131 and I-133 on the secondary side of the steam generator shall be less than or equal to 0.15 uCi/cc.

- B. Except as modified by 3.4.B(1) and 3.4.C below, if any of the conditions of 3.4.A above cannot be met within 72 hours, the reactor shall be placed in the hot shutdown condition within the next 12 hours and subsequently cooled below 350°F using normal operating procedures.
 - (1) With one or more auxiliary feedwater pump(s) inoperable take the following actions:
 - a) With one auxiliary feedwater pump inoperable, restore the pump to operable status within 72 hours or place the reactor in the hot shutdown condition and subsequently cool the RCS to below 350°F using normal operating procedures within the next 12 hours.
 - b) With two auxiliary feedwater pumps inoperable, place the reactor in hot shutdown and subsequently cool the RCS below 350°F using normal operating procedures within 12 hours.
 - c) With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to operable status while maintaining power at existing level until at least one auxiliary feedwater pump has been restored to operable status, and then immediately comply with the requirements of 3.4.B(1)(b) above.
- C. If when above 350°F one of the series valves (CT-6 and/or CT-64) in the condensate storage tank discharge line is closed, then:
 - (1) Immediately place the auxiliary feedwater pump controls in the manual mode, and
 - (2) Within one (1) hour, either valve(s) shall be reopened or the valves from the alternate city water supply shall be opened and the auxiliary feedwater pump controls restored to the automatic mode.

If these requirements cannot be met, then:

- (1) maintain the plant in safe stable mode which minimizes the potential for a reactor trip, and
- (2) continue efforts to restore water supply to the auxiliary feedwater system, and
- (3) notify the NRC within 24 hours regarding the planned corrective action.

ATTACHMENT B

Safety Assessment

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
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SAFETY ASSESSMENT

The proposed revisions to Technical Specification 3.4.B as contained in Attachment A to this Application would modify the Indian Point 2 (IP-2) Technical Specifications using provisions regarding the limiting conditions of operation for inoperable auxiliary feedwater pumps contained in the Standard Technical Specifications for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 4.

Currently, Technical Specification 3.4.A(2) requires that three auxiliary feedwater pumps be operable when the RCS is above $350^{\circ}F$. If this requirement cannot be met within 72 hours, then Technical Specification 3.4.B requires the reactor to be placed in the hot shutdown condition within the next 12 hours and subsequently cooled below $350^{\circ}F$ using normal operating procedures. The proposed changes will add additional limiting conditions of operation for up to three auxiliary feedwater pumps out of service. The additional limitations apply to one, two, and three auxiliary feedwater pumps that may be in an inoperable condition.

The proposed change would conservatively increase the limitations imposed by the existing technical specifications. In the case with one auxiliary feedwater pump inoperable, if operability is not restored within the 72 hour period, it would be required that the reactor be placed in the hot shutdown condition, and the RCS cooled to below $350^{\circ}F$, both within the In the case with two auxiliary feedwater pumps next 12 hours. inoperable, it would be required that the reactor be placed in the hot shutdown condition, and the reactor be cooled below 350°F, both within 12 hours. In the case with three auxiliary feedwater pumps inoperable, it would be required that corrective action to restore at least one auxiliary feedwater pump to operable status be initiated as soon as possible. Operation of the plant with these additional restrictions on the auxiliary feedwater pump operability will make it more likely that the plant will always be operated with sufficient available heat removal capability, given a demand.

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 (ii) of those involving no significant hazards considerations discusses a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications. The proposed change to Technical Specification 3.4.8 will add additional limiting conditions for operation with up to three auxiliary feedwater pumps out of service. These additional limitations would specify different actions with one, two or three auxiliary feedwater pumps out of service, respectively. Thus, the proposed change would add additional limitations that are not presently included in the technical specifications.

Consistent with the Commission's criteria for determining whether a proposed amendment to an operating license involves no significant hazards considerations, 10 CFR 50.92 (48 FR 14871), we have determined that the proposed change will 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 involve any physical change in plant equipment. The additional limiting conditions for operation of the auxiliary feedwater pumps are not expected to increase either the probability or consequences of previously analyzed accidents since the time period during which more than one auxiliary feedwater pump may be unavailable will be reduced.
- (2) create the possibility 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 since the additional limiting conditions for operation would tend to increase the availability of the auxiliary feedwater pumps.
- (3) involve a significant reduction in a margin of safety, since with the proposed change, safety margin is enhanced. By reducing the time duration that the plant may be without operable auxiliary feedwater pumps, the proposed change does not reduce the margin of safety associated with heat removal capability.

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.