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July 6, 1987

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

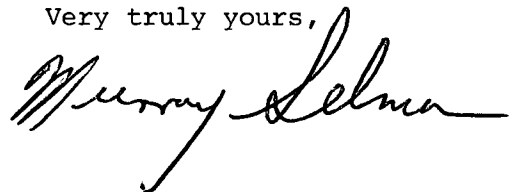
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Revised No Significant Hazards Consideration Analysis for the
Application for Amendment to the Unit #2 Operating License Dated
May 29, 1987

In accordance with the request of the NRC staff, this letter transmits a revised No Significant Hazards analysis to supplement our May 29, 1987 application to amend the Indian Point Unit No. 2 Technical Specifications to permit an extension of the maximum 3.25 surveillance interval limit. The revised no significant hazards consideration analysis represents a more complete discussion of the evaluation of the three criteria of 10 CFR 50.92(c) that provides the basis for the determination there are that no significant hazards considerations involved with that application.

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

Very truly yours,



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Enclosures

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cc: Continued

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Revised No Significant Hazard
Consideration Analysis
For The
"Application For Amendment To
IP-2 Operating License"
Dated May 29, 1987

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

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 change to extend the surveillance interval limits is in a less restrictive direction and would appear to reduce a safety margin. However, consistent with the Commission's criteria in 10 CFR 50.92, we have determined that the proposed change does not involve a significant hazards consideration because the operation of Indian Point Unit No. 2 (IP-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 would extend the 3.25 surveillance interval to allow certain tests to be performed during 1987 (cycle 7/8) refueling outage. The earliest date for performing an affected surveillance test is September 5, 1987. Our safety assessment determination is based on the next refueling and maintenance outage to start on approximately November 1, 1987. Therefore, the maximum extension for any single surveillance item is for a duration of less than two (2) months in 58.5 months. This represents an extension of just 3% above the 3.25 surveillance interval limit. Even with the extension, all of the surveillance tests for the equipment in Table 1 would be performed within the single allowable Technical Specification interval between two tests, i.e. 18 months plus 25%. As a result of our review of previous test results we have concluded that there is no reason to expect significant safety-related component failures during the extension period. Therefore, there is no significant reduction in the overall reliability of the IP-2 reactor protection system and engineered safety features. Thus, the ability of the component to perform its intended safety function during the extension period will be maintained to at least an equivalent level as currently provided by the Technical Specification for a maximum single surveillance interval. Since the proposed surveillance interval extension does not involve any physical change in plant equipment and would not affect the capability of the current instrumentation and components of IP-2 to perform their intended function, there would be no significant effect on the potential initiating mechanisms or the consequences of an accident. Therefore, the proposed change would not significantly increase the probability or consequences of an accident.

- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change only extends for certain tests the maximum 3.25 surveillance interval limit. The extension is of a short duration and within the single permissible Technical Specification interval limit. In order to more fully evaluate the present test interval extension request, the results of previous surveillance tests were reviewed for the purpose of determining if there was any reason to expect significant safety-related component failures during the proposed extension period. The evaluation considered the potential impact that prior tests of the components would have on the equipment and its required performance assumed in the FSAR transient and accident analysis. The result of that evaluation indicates that there is no reason to expect any increase in affected safety-related component failures during the extension period and that due to the redundancy and diversity of the IP-2 safety systems, there would be no significant reduction in the overall reliability of the IP-2 protection systems associated with the requested surveillance test interval. Thus, the level of equipment performance would be at least equivalent to that currently provided by the Technical Specifications for a maximum surveillance interval between any two tests.

The proposed change would not impact any component, system or structures not described in FSAR and would not create a new or increased potential for interacting with components, systems or structure which are described in the FSAR. Thus, since the change would introduce no physical modification and has been determined to have no deleterious effect on system reliability, operation and safety, it could not create the possibility of a new or different kind of accident.

- (3) involve a significant reduction in a margin of safety. The safety significance of extending the 3.25 surveillance limit is associated with extending a 58.5 month interval by a maximum of 2 months and the confidence that the affected component or system will continue to perform their intended function during the period where the tests would be deferred. All of the surveillance items listed in Table 1 will be due prior to the next refueling outage solely because of the 3.25 maximum combined surveillance limit. The tests listed will all be performed within the single permissible Technical Specification surveillance interval limit of 18 months + 25%. In addition, the results of previous surveillance tests of the components which are the subject of the request were evaluated to determine if there was any reason to expect a significant increase in safety related failures during the extended surveillance intervals. The evaluation considered the potential impact that prior tests 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 would be no significant reduction in the overall reliability of IP-2

protection system associated with the extension of the surveillance interval and thus, no impact on the licensing basis of IP-2. For all the affected tests, 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 + 25%).

Furthermore, the maximum extension for any single surveillance item listed in Table 1 is for a period of less than two (2) months in 58.5 months (3.25 times the nominal 18 month surveillance interval). This represents an extension of 3% with regard to the 3.25 surveillance interval limit. Thus, the requested extension is not significant with regard to the surveillance interval limit, and compares favorably with the alternatives of a plant shutdown or placing the plant in an operational risk, either of which could result in a reactor trip and plant transient. Thus, it is concluded that the operation of IP-2 with the proposed change would not involve a significant reduction in a margin of safety.

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

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.