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August 3, 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 No. 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 the Residual Heat Removal pumps to remain operable during the performance of the Safety Injection System test. 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,

John A. Basile

190.4.15.2
Enclosures

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Basis for No Significant Hazards Consideration Determination

The proposed change to Technical Specification 4.5.A.1.a will eliminate the requirement to make the residual heat removal pumps inoperable during performance of safety injection system tests during refueling shutdowns. The current specification to block these pumps from starting during the system test is not a safety requirement but rather a system condition for testing, designed to assure operability without the potential wear associated with too frequent testing.

Consistent with the Commission's criteria for determining whether a proposed amendment to an operating license involves no significant hazards consideration, 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. Maintaining an RHR pump in an operable condition during the performance of the safety injection system test will actually decrease the probability of a postulated accident and will leave unchanged the consequences of such an accident. There are two parameters that must be reviewed to yield this conclusion. First, the Safety Injection System test will not be functionally different from that which has been performed in the past. Therefore, with respect to this parameter, which does not change, the probabilities and consequences of postulated accidents remain identical. The second parameter inherent in the proposed change, is the maintenance of RHR cooling during the Safety Injection System test. By maintaining an RHR pump operable during the test, decay heat removal is retained and need not be disrupted at any time during the test. Having an operable RHR System is always as safe or safer than having it inoperable for any period of time. With respect to this parameter, there is, therefore, an actual decrease in the probability of an accident and no change has been introduced in the consequences of that accident. The overall result, therefore, of the proposed change is the summation of the above which results in a slight decrease in the probability of an accident and no increase (or decrease) in the consequences of that accident.
2. increase the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the proposed change does not involve any physical change in plant equipment and the Safety Injection System test is functionally no different than that performed in the past. The basic difference will be that a RHR pump will be operable and, if this should fail, both RHR pumps will be inoperable which is the same condition under which the test has always been performed in the past. The proposed change, therefore, introduces no conceivable new or different kind of accident from any previously evaluated.

3. involve a significant reduction in a margin of safety. By not disrupting decay heat removal at any time during the Safety Injection System test, the margin of safety inherent in the RHR system's use is actually increased. Once again, having the system operable at all times is always at least as safe or safer than disrupting it for any period of time. Any failure in the system, with the proposed change in effect, renders the plant condition identical to what it would have been without the change and, therefore, the margin of safety in the system, as well as overall, cannot decrease and may well increase.

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.