

ATTACHMENT A

Technical Specification  
Page Revisions

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

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3.13

DELETED

Amendment No.

3.13-1

4.14

DELETED

Amendment No.

4.14-1

f. Deleted

- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.3

FACILITY STAFF QUALIFICATIONS

6.3.1

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2

The General Manager-Nuclear Power Generation shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3

The Shift Technical Advisor (STA) shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4

TRAINING

6.4.1

A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2

Deleted

6.5

REVIEW AND AUDIT

6.5.1

STATION NUCLEAR SAFETY COMMITTEE (SNSC)

FUNCTION

6.5.1.1

The Station Nuclear Safety Committee shall function to advise the Vice President-Nuclear Power on all matters related to nuclear safety.

REVIEW (Continued)

- g. Reportable Events, as specified by 10 CFR 50.73.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Station Nuclear Safety Committee.
- j. Environmental surveillance program pertaining to radiological matters.

AUDITS

6.5.2.8

Audits of facility activities shall be performed under the cognizance of the NFSC. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Radiological Technical Specifications (Appendix A) and applicable license conditions at least once per 12 months.
- b. The conformance to all provisions contained within the Environmental Technical Specifications (Appendix B) pertaining to radiological matters and applicable license conditions at least once per 12 months.
- c. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- d. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- e. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- f. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- g. The Facility Security Plan and implementing procedures at least once per 12 months.
- h. Deleted

- i. Deleted
- j. Deleted
- k. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- l. The Offsite Dose Calculations Manual and implementing procedures at least once per 24 months.
- m. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.
- o. Any other area of facility operation considered appropriate by the NFSC or the President of the Company.

#### Authority

- 6.5.2.9 The NFSC shall report to and advise the President of the Company on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

#### Records

- 6.5.2.10 Records of NFSC activities shall be prepared, approved and distributed as indicated below:
- a. Minutes of each NFSC meeting shall be prepared, approved and forwarded to the President and to Senior Company Officers concerned with nuclear facilities within 14 days following each meeting.
  - b. Reports of reviews encompassed by Section 6.5.2.7 e, f, g and h above, shall be prepared, approved and forwarded to the President and to Senior Company Officers concerned with nuclear facilities within 14 days following completion of the review.
  - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Company Officers concerned with nuclear facilities and to the management positions responsible for the areas audited within 30 days after completion of the audit.

Monthly Operating Report

- 6.9.1.7 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORV's or Pressurizer safety valves shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D C. 20555, no later than the 15th of each month following the calendar month covered by the report.

Special Reports

- 6.9.2 Special reports shall be submitted to the NRC Regional Administrator of the Region I Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:
- a. Each containment integrated leak rate test shall be the subject of a summary technical report including results of the local leak rate test since the last report. The report shall include analyses and interpretations of the results which demonstrate compliance in meeting the leak rate limits specified in the Technical Specifications.
  - b. Deleted
  - c. Sealed source leakage in excess of limits (Specification 4.15).
  - d. The complete results of the steam generator tube inservice inspection (Specification 4.13.C).
  - e. Radioactive effluents (Specification 3.9).
  - f. Radiological environment monitoring (Specification 4.11)
  - g. Meteorological monitoring instrumentation (Specification 3.15).
  - h. Inoperable radiation and hydrogen monitoring instrumentation (Specification 3.5) outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.
  - i. Operation of overpressure protection system (Specification 3.1.A.4)

ATTACHMENT B

License Condition Revisions

Consolidated Edison Company of New York, Inc.  
Indian Point Unit, No. 2  
Docket No. 50-247  
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- K. Con Edison shall implement and maintain in effect all provisions of the approved fire protection program as described by reference in the Updated Final Safety Analysis Report and as approved in the Safety Evaluation Reports dated January 31, 1979 and August 22, 1983 and Supplements dated March 30, 1984, October 16, 1984 and March 4, 1987.

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- L. The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

- M. The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

3. This license is effective as of the date of issuance, and shall expire at midnight on September 28, 2013.

ATTACHMENT C

Safety Assessment

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

## SAFETY ASSESSMENT

This request deletes Technical Specifications 3.13 and 4.14 and revises Technical Specifications 6.2.2, 6.4, 6.5.2.8, and 6.9.2 and license conditions 2.C.(2) and 2.K as described in Attachments A and B. These changes and their respective Safety Assessments are discussed below.

1. Technical Specification 3.13, Fire Protection and Detection Systems, is deleted. This specification addresses the high pressure water and spray fire protection systems, penetration fire barriers, fire detection systems, hose stations and hydrants and the cable spreading room halon system. This specification applies to the operability of fire protection and detection systems and identifies the numbers, types, and locations of equipment and flow paths and water supplies required for protection of safe shutdown systems. It also specifies actions to be taken when the minimum operability requirements for fire protection and detection equipment are not met.

Technical Specification 4.14, Fire Protection and Detection Systems (Surveillance Requirements), is deleted. This specification defines the periodic activities performed to verify the operability of fire protection and detection systems to ensure that the minimum system operability requirements are met in order to protect equipment utilized for plant safe shutdown.

These specifications are intended to ensure the implementation and maintenance of fire protection design features (e.g. detection, suppression and fire barriers) described in the fire protection program. The requested license amendment deletes these Technical Specifications and associated bases. However, implementation and maintenance of the fire protection program will continue to require operability of the fire protection design features presently covered by these Technical Specifications as a result of the requested change to License condition 2.K, which implements and maintains the approved fire protection program as described by reference in the Updated Final Safety Analysis Report (UFSAR). At Indian Point, the approved fire protection program is contained in the document entitled, "Indian Point Unit 2 Fire Protection Program Plan," which is referenced as part of the UFSAR.

The Fire Protection Program Plan (FPPP) includes the program aspects and fire protection design provisions pertaining to safety related and safe shutdown features in effect at Indian Point Unit No. 2 (IP2). The Technical Specifications to be deleted include only certain aspects of the fire protection program which protect safe shutdown equipment in the event of a fire. These specifications cover a subset of the fire protection design features described in the FPPP. The periodic testing and inspection of the the fire protection design features and actions to be taken in the event of inoperability currently addressed in the Technical Specifications have also been

included in the impairment criteria of the FPPP and implemented by controlled plant procedures. Thus, the deletion of these Technical Specifications would eliminate unnecessary redundancy in accordance with NRC Technical Specification simplification initiatives and would simplify the administrative implementation of fire protection requirements at IP2.

The deletion of the plant shutdown restriction requirements based upon loss of operability of the high pressure water fire protection system is found acceptable for the following reasons.

- a) The IP2 Alternate Safe Shutdown System, which assures that the plant can be brought to a controlled safe shutdown given a fire, does not rely on the high pressure water system. In any case, several means of fire detection and fire protection are still operable, since they are not affected by the loss of the high pressure water system. Backup hydrants in the yard area are supplied by the city water system. Fire detection instrumentation is available allowing detection of a fire and response by plant personnel using operable fire fighting capabilities. Plant fire barriers providing fire isolation of safe shutdown equipment from non-safe shutdown equipment and between trains of safe shutdown equipment (including the ASSS) are operable. In addition, Halon fire suppression protects certain vital electrical equipment (e.g., the Cable Spreading Room Halon System).
  - b) The inoperability of the fire suppression water system will effectively cause loss of operability of spray and sprinkler systems and fire hydrant and hose stations. The critical spray and sprinkler systems and hydrant and hose stations have their own action requirements to ensure that fire protection is maintained. These action requirements will be sufficiently maintained in the FPPP and implemented by plant procedures.
  - c) Impairment Criteria in the FPPP requires establishment of a backup fire protection system within 24 hours. In order to ensure that appropriate actions are taken if a backup system is not available, actions designed to minimize the risk of fire will be required (e.g., fire watches).
2. Technical Specification 6.2.2, Facility Staff, is revised to delete item f. which identifies the requirements for a fire brigade. Specification 6.4, Training, is revised to delete section 6.4.2 which requires a fire brigade training program. The requirements for the establishment and training of a fire brigade deleted in Technical Specifications 6.2.2 and 6.4 have been incorporated in the FPPP and, therefore, continue to be required by proposed License Condition 2.K, as discussed below.

3. Technical Specification 6.5.2.8, Audits, is revised to delete items h., i. and j. which require periodic audits of the facility fire protection and loss prevention program and implementing procedures. These fire protection program and procedure auditing requirements have been incorporated in the FPPP and continue to be required by proposed License Condition 2.K.
4. Technical Specification 6.9.2, Special Reports, is revised to delete item b. which addresses the inoperability of the fire protection and detection equipment within the scope of specification 3.13 previously deleted. With the deletion of Technical Specification 3.13, the special reporting requirement of Specification 6.9.2 is no longer applicable. Fire protection program compliance and reporting will continue as required by proposed License Condition 2.K.
5. License conditions 2.C.(2) and 2.K, dealing with changes to the Fire Protection Program, are revised in accordance with the guidance provided in Section F of Generic Letter 86-10, Implementation of Fire Protection Requirements. Generic Letter 86-10 establishes requirements for control of the Fire Protection Program as part of the UFSAR.

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) of amendments that are considered not likely to involve significant hazards considerations. Example (vii) relates to a change which makes a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. In this case, NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements," although not a regulation, provides pertinent guidance relative to the above described proposed changes and implementation of the NRC fire protection regulations. Specifically, Generic Letter 86-10 allows licensees to delete fire protection related technical specifications provided that a license condition requires implementation and maintenance in effect of the approved fire protection program to be referenced by the license condition. Further, Generic Letter 86-10 provides for incorporation of the fire protection program into the UFSAR and future changes to the fire protection program without prior NRC approval, all as provided by the license condition and in accordance with 10CFR50.59.

Consistent with the Commission's criteria for determining whether a proposed amendment to an operating license involves no significant hazards consideration, 10CFR50.92 (48 FR 14871), we have determined that the aforementioned proposed change would not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated, since the fire protection program requirements are not being changed, with the exception of deletion of the plant shutdown restriction requirements presently

dictated by Specification 3.13.A.3(c) for the high pressure water fire protection system. Deletion of these requirements would not involve a significant increase in the probability or consequences of an accident previously evaluated because the Fire Hazards Analysis does not solely rely on the high pressure water protection system to ensure the capability to achieve safe shutdown in the event of a fire, and the plant accident analysis does not assume that a Design Basis Accident occurs simultaneously with a fire. The IP-2 Alternate Safe Shutdown System (ASSS), which assures that the plant can be brought to a controlled safe shutdown given a fire, does not rely on the high pressure water system. In any case, several means of fire detection and fire protection are not affected by the loss of the high pressure water system and therefore remain operable. These fire protection capabilities include fire detection instrumentation, plant fire barriers, halon fire suppression and backup hydrants supplied by city water. Also, impairment criteria in the IP-2 Fire Protection Program Plan (FPPP) requires establishment of an additional backup fire protection system or verification of ASSS operability within 24 hours.

- 2) create the possibility for a new or different kind of accident from any previously evaluated, since the proposed change does not involve any physical change in plant equipment. The shutdown requirement is unnecessary because fire detection and fire protection capabilities remain available in the event of the loss of the high pressure water system. Thus, deletion of this shutdown requirement will not create the possibility for a new or different kind of accident from any previously evaluated. With the exception of the unnecessary shutdown requirement, those aspects of the fire protection program covered by existing Technical Specifications will continue to be implemented. The FPPP includes the program aspects and fire protection design provisions pertaining to safety related and safe shutdown features in effect at IP-2. Implementation and maintenance of the fire protection program will continue to require operability of the fire protection design features presently covered by the requested change to License Condition 2.K, which requires the approved fire protection program, as described by reference in the Updated Final Safety Analysis Report (UFSAR), to continue to be properly implemented and maintained.
- 3) involve a significant reduction in the margin of safety, since the fire protection program compliance will continue as required by proposed License Condition 2.K as part of the UFSAR. With the proposed change, all safety criteria previously evaluated are still met and remain conservative. The periodic testing and inspection of the fire protection design features and actions to be taken in the event of inoperability currently addressed in the Technical Specifications have been included in the impairment criteria of the IP-2 FPPP and implemented by controlled plant

procedures to conform to the current interpretation of NRC fire protection regulations. The proposed deletion of the shutdown requirement for the loss of the high pressure water fire protection system does not involve a significant reduction in the margin of safety since alternate means of fire detection and fire protection remain available.

The proposed change would revise license condition 2.K to require implementation and maintenance in effect of the approved fire protection program which is described in the UFSAR, and the "Indian Point Unit 2 Fire Protection Program Plan," which, by reference, is part of the UFSAR and contains the Fire Hazards Analysis. The UFSAR is updated annually in accordance with 10CFR50.71(e). The proposed license condition would allow Con Edison to make changes to the approved fire protection program without prior NRC approval provided that those changes do not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. The proposed license condition is consistent with the standard license condition provided by Generic Letter 86-10.

The proposed change would also delete existing technical specifications relating to implementation of the fire protection program. Those aspects of the fire protection program covered by existing technical specification will continue to be implemented. Deletion of the technical specification requirements as described above is consistent with NRC Generic Letter 86-10.

Because the proposed change described above makes the license conform to the current interpretation of NRC fire protection regulations, the proposed change is similar to example (vii) of 48 FR 14870 and does not involve significant hazard considerations.

The proposed changes have been reviewed by both the Nuclear Power Station Nuclear Safety Committee and the Consolidated Edison Nuclear Facilities Safety Committee. Both committees concur that the proposed changes do not represent a significant hazards consideration.