

Attachment A

Technical Specification  
Page Revisions

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
August 29, 1988

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Table 3.13-2 (1 of 2)

Fire Hose Stations and Fire Hydrants

| Hose Station or Hydrant | Location                                      |
|-------------------------|---|
| 1. Hose Station         | Stairwell No. 3 -<br>Control Building: El-15' |
| 2. Hose Station         | Stairwell No. 3 -<br>Control Building: El-33' |
| 3. Hose Station         | Stairwell No. 3 -<br>Control Building: El-53' |
| 4. Hose Station         | Stairwell No. 4 -<br>Control Building: El-53' |
| 5. Hose Station         | East End of PAB: El-98'                       |
| 6. Hose Station         | West End of PAB: El-98'                       |
| 7. Hose Station         | East End of PAB: El-80'                       |
| 8. Hose Station         | West End of PAB: El-80'                       |
| 9. Hose Station         | West End of PAB: EL-68'                       |
| 10. Hose Station        | West End of PAB: El-15'                       |
| 11. Hose Station        | Piping Penetration Area -<br>PAB: EL-54'      |
| 12. Hose Station        | Southeast End of FSB: El-96'                  |
| 13. Hose Station        | Southeast End of FSB: El-140'                 |
| 14. Hose Station**      | North Side of Containment:<br>El-95'          |
| 15. Hose Station**      | South Side of Containment:<br>El-95'          |
| 16. Hose Station**      | North Side of Containment:<br>El-46'          |
| 17. Hose Station**      | South Side of Containment:<br>El-46'          |

\*\* Effective upon startup of Cycle 5 operation.

Attachment B  
Safety Assessment

Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
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Safety Assessment

This application requests a change to Table 3.13-2(1 of 2) which reads:

Item 13. Hose Station Southeast End of FSB: El 104'

TO:

Item 13. Hose Station Southeast End of FSB: El 140'

The correct location of the Hose Station is El 140' and not El 104'. The figures were transposed in one of our earlier submittals to the NRC.

The current Indian Point Fire Protection Program Plan Rev 3, submitted on October 13, 1987, states clearly that the hose station is located on the roof of the FSB at elevation 140'.

The safety function of the Fire Protection Technical Specifications is to protect equipment utilized for safe shutdown of the unit. This safety function is not compromised by the proposed administrative correction.

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 (51 FR 7751). Example (i) of those involving no significant hazards consideration discusses a purely administrative change to Technical Specifications for correction of an error. The error consisted of transposing of elevation 140' to 104'. The Indian Point Fire Protection Program Plan (FPPP) Rev 3 states clearly that the hose station is located on the roof of the FSB at elevation 140'. 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 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 is administrative in nature. Thus, the same safety criteria as previously evaluated are still met with the proposed change.
- (2) create the probability of a new or different kind of accident from any accident previously evaluated. The proposed change to the actual location of the hose station does not modify the plant's configuration or operation, and therefore nothing would be added or removed that would conceivably introduce a new or different kind of accident mechanism or initiating circumstance than that previously evaluated.
- (3) involve a significant reduction in a margin of safety. With the proposed change, safety criteria previously evaluated are still met, remain conservative, and continue to maintain the previous margins of safety.