Stephen B. Bram Vice President

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Consolidated Edison Company of New York, Inc. Indian Point Station Broadway & Bleakley Avenue Buchanan, NY 10511 Telephone (914) 737-8116

September 23, 1988

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

Document Control Desk U.S. Nuclear Regulatory Commission Mail Station P1-137 Washington, DC 20555

SUBJECT: Request for Reactor Coolant System Leakage Detection Technical Specification Amendment

Consolidated Edison Company of New York, Inc. transmits herewith one (1) signed original and two (2) copies of an "Application for Amendment to the Operating License", sworn to on September 23, 1988. This Application requests an amendment to the Con Edison Indian Point Unit No. 2 ("IP-2") Technical Specifications.

The specific proposed Technical Specification (TS) changes are set forth in Attachment A to this Application. These changes revise the limiting condition for operation (LCO) action and basis for the containment radioactivity monitors relied upon as a means of reactor coolant system The LCO Action 3.1.F.1.b.(6) has been revised to leakage detection. reflect additional requirements that are more restrictive than presently imposed. Additionally, the basis of TS 3.1.F has been revised to make this specification more closely conform with guidance endorsed by the NRC via Regulatory Guide 1.45 and GDC-4. A safety assessment of the proposed change is presented in Attachment B to this Application. The FSAR changes related to this submittal will be incorporated into the next yearly update following approval of this amendment request, and will be considered applicable upon approval. They will reflect the incorporation of this amendment and the use of the Leak-Before-Break (LBB) Technology. This submittal is also supported by the LBB methodology which has been adopted for IP-2 and submitted to the NRC for approval by letter date May 23, 1988.

In addition to the above mentioned Technical Specification change, included in this submittal are changes to section 3.1.F that correct typographical errors, make minor editorial changes, and repaginate text for spatial uniformity purposes. Attachment C contains a detailed list of these changes.

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Pursuant to 10 CFR 170.12, a check in the appropriate amount is enclosed as payment of the application fee for the review of these proposed changes to the TS.

We request that this Technical Specification change be approved on a schedule consistent with the approval of our LBB submittal, currently scheduled for the end of 1988.

Should you or your staff have any questions regarding this matter, please contact Mr. Jude G. Del Percio, Manager, Regulatory Affairs.

Very truly yours,

cc: Mr. William Russell Regional Administrator - Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1498

Ms. Marylee M. Slosson, Project Manager Project Directorate I-1 Division of Reactor Projects I/II U.S. Nuclear Regulatory Commission Mail Stop 14B-2 Washington, DC 20555

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