UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
CONSOLIDATED EDISON COMPANY	)	Docket No. 50-247
OF NEW YORK, INC.	)	
(Indian Point Station,	)	
Unit No. 2)	)	

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Consolidated Edison"), as holder of Facility Operating License No. DPR-26, hereby applies for amendment of the Technical Specifications contained in Appendix A of that license. Specifically, Consolidated Edison requests that the Technical Specifications summarized in Attachment A be amended to allow transition to Westinghouse 15 x 15 Optimized Fuel Assembly (OFA) fuel at the current licensed power.

The specific proposed Technical Specification revisions are set forth in Attachment B to this Application. A Safety Assessment of the proposed changes is set forth in Attachment C to this Application. This assessment demonstrates that the proposed changes do not represent a significant hazards considerations as defined in 10 CFR 50.92(c).

As required by 10 CFR 50.91(b)(1), a copy of this application and our analysis concluding that the proposed changes do not constitute a significant hazards consideration have been sent to the appropriate New York State official designated to receive such amendments.

BY: Stephen B. Bram
Vice President
Nuclear Power

Subscribed and sworn to
before me this 30 day
of September, 1988

Anthony R. Arnone
Notary Public

ANTHONY R. ARNONE
Notary Public, State of New York
No. 4883047
Qualified in Westchester County
Commission Expires January 26, 19 89

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Attachment A

Summary of Technical Specification Changes

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
September 30, 1988

TABLE A-1

SUMMARY OF TECHNICAL SPECIFICATION CHANGES

Page	Section	Description of Change	Reason
vii	List of Figures	Rename Figure 2.1-1 to "Reactor Core Safety Limit Four Loops. Delete Figure 3.10-4. Corrected administrative errors in Amendment No. 111	Three loop operation was not analyzed for. References to three loop operation are removed throughout Tech. Specs. 310°F should have been changed to 295°F in Amendment No. 111.
2.1-1	2.1	Removed references to three loop operation, deleted paragraph on Region 1 Fuel, and moved DNB parameters to Section 3.1.G.	Region 1 paragraph is outdated. DNB parameters were moved for improved organization of Tech Specs.
2.1-2, 2.1-3,	2.1 Basis	Changed description of the DNB correlation, identifying the W-3 L-grid correlation for the evaluation of LOPAR fuel and the WRB-1 correlation for evaluation of OFA. Deleted References. Moved basis for DNB parameters to Section 3.1.G.	The DNBR related changes are due to the addition of OFA and the use of ITDP.
Figure 2.1-1		Revised reactor core safety limits.	New limits are based on ITDP. These limits provide protection for DNB and vessel exit boiling. Limits are different due to convoluting the plant uncertainties directly into the limit DNBR value.
Figure 2.1-2		Deleted Figure.	Westinghouse has not performed analyses for three loop operation.
2.3-2	2.3.1.B.(3)	Increased the Low Pressurizer Pressure reactor trip setpoint	Updated setpoint to be consistent with analysis.
2.3-2,3	2.3.1.B(4) and (5)	Revised OTΔT and OPΔT calculations, providing new K values, T' and T" values, and eliminating f(ΔI) from OPΔT equation. f(ΔI) was redefined for OTΔT. Removed references to three loop operation.	Change in setpoints reflects use of ITDP, new core limits, and instrument uncertainties to be consistent with analysis requirements. The revised OTΔT and OPΔT calculations reflect the standard Tech. Specs.

TABLE A-1 (Continued)

SUMMARY OF TECHNICAL SPECIFICATION CHANGES

Page	Section	Description of Change	Reason
2.3-4	2.3.3	Removed reference to LOPAR fuel. Removed references to three loop operations.	Requirement of the Control Rod Protection System is applicable for both LOPAR and OFA.
2.3-5	Basis	Basis of OPΔT reactor trip changed to prevent power density from exceeding 118% of design. Removed references to three loop operation.	Consistent with current Westinghouse methodology.
2.3-6	2.3 Basis	Changed previous reference to DNBR limit of 1.3 to"Safety Limit DNBR." Removed references to three loop operation.	Change due to the use of the ITDP.
2.3-7	2.3 Basis	Remove references to LOPAR fuel and three loop operation.	Analysis of mechanical interferences are applicable to both LOPAR and OFA fuel.
3.1.A-4	3.1.A Basis	Changed previous "1.3" to "the safety limit DNBRs".	Changed due to the use of the ITDP.
3.1.G-1	3.1.G	Add new section to include the DNB parameters of RCS Tavg, pressure, and flow, formerly included in Section 2.1. Revised pressure and flow values.	New section to improve organization of Tech. Specs. Revised values due to the use of the ITDP.
3.2-1	3.2.B.2	Changed minimum volume requirements of Boric Acid Storage System from 4400 to 6000 gallons.	Provides additional fuel management flexibility.
3.2-2	3.2 Basis	Changed values of Boric Acid Storage System volume requirements. Deleted reference to Boron Injection Tank (BIT)	Same. BIT no longer exists in plant.
3.3-1	3.3.A.1.c	Changed the Safety Injection Accumulators pressure and volume requirements.	Increased margin for LOCA analysis.
3.3-9,11	3.3 Basis	Renumbered references.	Updated references.
3.3-13	3.3 Basis	Added statement defining basis for minimum RWST boron concentration. Renumbered references.	To provide additional information.

TABLE A-1 (Continued)

SUMMARY OF TECHNICAL SPECIFICATION CHANGES

Page	Section	Description of Change	Reason
3.3-14	3.3 Basis	Changed references.	Reflect new LOCA analyses.
Table 3.5-1		Pressurizer low pressure safety injection set-point changed from 1700 to 1829 psig.	Included instrument accuracies added to analysis value.
3.6-1	3.6.A.1	Changed the shutdown margin from <10% $\Delta k/k$ to < 5% $\Delta k/k$ and added a condition for the boron concentration within the reactor to be less than 2000 ppm.	See Section 3.8.B.2 below.
3.6-2	3.6 Basis	Changed to be consistent with specification for refueling, Updated other bases to reflect current appropriate analyses.	See Section 3.8.B.2 below.
3.8-2	3.8.B.2	Changed the minimum boron concentration to $\geq$ 2000 ppm and added a condition for the shutdown margin to be $\geq$ 5% $\Delta k/k$.	The new shutdown margin criteria provides the additional fuel management flexibility.
3.8-5	3.8 Basis	Changed boron concentration requirements.	The new shutdown margin criteria provides additional fuel management flexibility.
3.8-6	3.8 Basis	Delete Reference 2.	The new shutdown margin criteria provides additional fuel management flexibility.
3.10-1	3.10.2.1	The FdH limit is changed.	Provides additional fuel management flexibility.

TABLE A-1 (Continued)

SUMMARY OF TECHNICAL SPECIFICATION CHANGES

Page	Section	Description of Change	Reason
3.10-5	3.10.4.2	Figure 3.10-4 is deleted.	References to three loop operation are being eliminated.
3.10-7	3.10.8	Rod drop time changed from 1.8 to 2.4 seconds, and is now defined as the period from gripper release to dashpot entry.	Increased time due to smaller guide tube in OFA than current fuel assemblies. Definition of time period is changed to reflect safety analysis. See basis on 3.10-16.
3.10.8	3.10 Basis	Changed reference to DNBR limit of 1.3 to "Safety Limit DNBRs."	Change due to the use of the ITDP.
3.10-9	3.10 Basis	Changed reference to FdH from 1.55/1.08 to 1.62/1.08.	New FdH is to allow more flexibility in core design.
3.10-12	3.10 Basis	Changed reference to DNBR limit of 1.3 to "Safety Limit DNBRs."	Change due to the use of the ITDP.
3.10-16	Basis	Changed reference 1 to FSAR Section 14.3.	Reflect new LOCA analyses.
Figure 3.10-2		Changed K<z> curve, increasing third line segment endpoint. This curve envelopes operations with tube plugging up to 25%.	Reflect new LOCA analyses.
Figure 3.10-3		Corrected spelling of "overlay".	
Figure 3.10-4		Figure deleted, although figure number was preserved.	Figure for three loop operation is not needed.
3.11-1	3.11	Removed reference to four and three loop operation. Deleted footnote 1.	Three loop operation references should all be removed. Footnote 1 applied only in 1976.
5.3-2	5.3.8.3	Added that "nominal" RCS volume is for 0% tube plugging.	The RCS volume varies with tube plugging levels.