

Attachment I

IP-2 Technical Specifications
Proposed Page Revisions

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

4.16 REACTOR COOLANT SYSTEM AND CONTAINMENT FREE VOLUME LEAKAGE DETECTION AND REMOVAL SYSTEMS SURVEILLANCE

Applicability

Applies to the surveillance and monitoring of leakage detection and removal systems provided for determining and removing reactor coolant leakage and leakage into the containment free volume. Applies to the testing of certain LPI/RHR check valves(1,2).

Objective

To verify compliance with operational leakage limits of Specification 3.1.F. To specify a test to check for RCS leakage through certain check valves.

Specifications

- A. For the purposes of demonstrating compliance with the operational leakage limits of Specification 3.1.F., the following shall be performed:
1. At least once a shift, monitor the leakage detection systems required by Specification 3.1.F.1.a(6).
 2. At least once a shift, monitor the containment sump inventory and discharge.
 3. At least once a shift, monitor the recirculation sump inventory and the reactor cavity inventory.
 4. At least once daily, perform a reactor coolant system water inventory balance.
 5. For the RCS/RHR pressure isolation valves, periodic leakage testing* shall be accomplished every time the plant is placed

* To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria. Minimum test differential pressure shall not be less than 150 psid.

in the cold shutdown condition for refueling, each time the plant is placed in a cold shutdown condition for at least 72 consecutive hours if testing has not been accomplished in the preceding 9 months, and prior to returning the valve to service after maintenance, repair or replacement work is performed.

- B. A test shall be performed, whenever the RCS pressure decreases to 700 psig (i.e. within 100 psig of the RHR design pressure) or whenever the RHR is secured to go to hot shutdown, to check for leakage through SIS low head injection line check valves 897A-D and RHR check valves 838A-D.
- C. The containment sump pumps required to be operable by Specification 3.1.F.1.a(1) shall be demonstrated to be operable by performance of the following surveillance program:
 - 1. At monthly intervals, each sump pump shall be started and a discharge flow of at least 25 gpm verified.
 - 2. At refueling intervals, each sump pump shall be operated under visual observation to verify that the pumps start and stop at the appropriate setpoints and that the discharge flow is at least 25 gpm per pump.

Basis

Specifications 4.16.A and 4.16.C establish the surveillance program for monitoring reactor coolant system leakage and leakage into the containment free volume during plant operation and ensure compliance with Specification 3.1.F. These specifications also establish surveillance requirements for the containment sump pumps. Surveillance requirements for the various leakage detection instrumentation systems are contained in Table 4.1-1 of these specifications.

Specification 4.16.B was added to the Technical Specifications in response to NRC's July 5, 1985 rescission of our February 11, 1980 Confirmatory Order Item A.5. Item A.5 was developed to address the intersystem loss-of-coolant accident (Event V) identified in WASH-1400^(1,2). The RHR system design pressure is 600 psig.

References

- (1) NRC Letters dated July 5, 1985, and February 11, 1980
- (2) Con Edison Letter dated March 14, 1980

Attachment II
Safety Assessment

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

By letter dated February 11, 1980, the NRC transmitted a Confirmatory Order (also dated February 11, 1980) which amended Facility Operating License No. DPR-26 by incorporating and confirming certain commitments made by Con Edison in its February 1, 1980 letter. Item A.5 of that Confirmatory Order, contained in Appendix A to the February 11, 1980 letter, required that we:

"Conduct testing to assure that the LPI/RHR check valves are in fact installed correctly and functioning as pressure isolation barriers when the plant is at pressure and producing power. Verification of valve operability shall be performed prior to plant restart if shutdown at the time of issuance of the Order and thereafter whenever RCS pressure has decreased to within 100 psig of RHR system design pressure."

On July 5, 1985, the Commission issued a Rescission of the February 11, 1980 Confirmatory Order. This Rescission was based on the Commission's Decision CLI-85-06 dated May 7, 1985. However, Item A.5 of the Order was not rescinded. In particular, the July 5, 1985 NRC letter stated:

"...the licensee shall follow the Order Item A.5 until Technical Specifications implementing the generic letter have been submitted to and approved by the NRC. Upon such approval the Order is rescinded with respect to this item."

The Generic Letter referenced was dated February 23, 1980, and is entitled "LWR Primary Coolant System Pressure Isolation Valves." Valve operability and leakage requirements, as set forth in that generic letter, were imposed on most licensees other than the Indian Point licensees by Orders issued during April, 1981.

Our response, dated March 14, 1980, to the generic letter committed us to test these check valves whenever the Reactor Coolant System ("RCS") pressure has decreased to within 100 psig of the Residual Heat Removal ("RHR") system design pressure. This commitment was first made on January 11, 1980 as part of the Indian Point/Zion Near Site Studies presentation to the Staff, and reaffirmed in our February 1, 1980 letter to NRC. Furthermore, this commitment was included in the February 11, 1980 Confirmatory Order.

The purpose of this proposed Technical Specification amendment is to transfer the requirement to test these particular valves from the Order Item A.5 to the IP-2 Technical Specifications. On NRC approval of this proposed amendment, Confirmatory Order Item A.5 will be considered rescinded.

Basis For "No Significant Hazards Considerations" Determination:

In accordance with the requirements of 10 CFR §50.92, the proposed Technical Specification changes are deemed to involve "no significant hazards considerations."

1. Operation of IP-2 in accordance with these changes would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed technical specification test requirement is currently required by the February 11, 1980 Confirmatory Order Item A.5. This proposed amendment merely transfers the test requirement from the Confirmatory Order to the IP-2 Technical Specifications. Moreover, the consequences of doing or not doing this testing have been previously reviewed by NRC in various submittals; namely our March 14, 1980 response to NRC's February 25, 1980 Generic Letter "LWR Primary Coolant System Pressure Isolation Valves," and NRC's Confirmatory Order dated February 11, 1980 and subsequent Commission recession of that Order, dated July 5, 1985. By committing to test the SIS low head injection line check valves 897A-D and the RHR check valves 838A-D whenever RCS pressure has decreased to within 100 psig of the RHR system design pressure, the probability of Event V for Indian Point No. 2 has been reduced to 6.2×10^{-12} /reactor year from the WASH-1400 five year average failure probability of 4×10^{-6} /reactor year.

2. Operation of IP-2 in accordance with these changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification test requirement is currently required by NRC's February 11, 1980 Confirmatory Order, Item A.5, and is required to address the intersystem loss-of-coolant accident (Event V) identified in the WASH-1400. By transferring the requirement to perform the particular test from the Order Item A.5 to the Technical Specifications, a new or different kind of accident from that previously evaluated cannot be created.

3. Operation of IP-2 in accordance with these changes would not involve a significant reduction in a margin of safety.

The proposed Technical Specification test requirement, which is currently required by the February 11, 1980 Confirmatory Order Item A.5, does not reduce nor change the margin of safety from that existing now. The proposed amendment only transfers the requirement to perform the particular test from the Order Item A.5 to the Technical Specifications. It has previously been demonstrated that by performing the test the margin of safety increases.

The Commission has provided guidance concerning the application of the standards for determining whether "significant hazards considerations" exist by providing certain examples at 48 FR 14870 (April 6, 1983; Interim Final Rule) and at 51 FR 7744 (March 6, 1986; Final Rule).

Example (ii) of 51 FR 7744 (Vol. 51, No. 44, Page 7751), which applies to the addition of the surveillance requirement in the IP-2 technical specifications, states:

"(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement."

In addition, example (i) of 51 FR 7744, which applies to the editorial changes, states:

"(i) A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

Therefore, since this application for amendment satisfies the criteria specified in 10 CFR §50.92, and is similar to examples for which "no significant hazards considerations" exist, Con Edison has made a determination that the application involves "no significant hazards considerations."

The incorporation of this proposed amendment into the IP-2 Technical Specifications: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously; c) will not reduce the margin of safety; d) does not constitute an unreviewed safety question; and e) involves "no significant hazards considerations" as defined in 10 CFR §50.92. Furthermore, these changes will not adversely impact the following: ALARA Program, Security and Fire Protection Programs, Emergency Plan, FSAR Conclusions, overall plant operations, and the environment.

The proposed changes have been reviewed by the Station Nuclear Safety Committee and the Con Edison Nuclear Facilities Safety Committee. Both committees concur that these changes do not represent any "significant hazards considerations."

Attachment III
Detailed Page Change Description

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<u>Present Page(s)</u>	<u>Present Section(s)</u>	<u>Change(s)</u>
4.16-1	Top	Deleted section title underline.
4.16-1	4.16.A.1, 4.16.A.2, 4.16.A.3	Added a comma after "At least once a shift".
4.16-1	4.16.A.4	Added a comma after "At least once daily".
4.16-1	4.16.A.5	Changed "(*)" to "*" and moved a portion of the text to page 4.16-2 as a result of line spacing adjustments.
4.16-1	Footnote	Changed designation from "(*)" to "*".
4.16-2	4.16.C, 1st line	Changed "specification" to "Specification".