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January 25, 1989

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

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

SUBJECT: Technical Specification for Reactor Trip Breakers
Generic Letter 85-09 (TAC No. 55358)

On August 18, 1986 we submitted an Application for amendment to the Indian Point Unit No. 2 Technical Specifications which reflected new requirements for operation and testing of the reactor trip breakers. In that letter we proposed an allowed out-of-service time of forty eight hours with one reactor trip logic train inoperable (incapable of tripping) before the reactor had to be placed in the hot shutdown condition. This is different from the Generic Letter 85-09 requirements which permits six hours of operation prior to hot standby under such conditions and limits to two hours the time a train may be inoperable for surveillance testing.

On December 12, 1988 a meeting was held between members of the NRC staff and members of the Con Edison engineering staff to resolve all outstanding issues related to this subject. The attached Technical Specification pages reflect the changes resulting from the December 12, 1988 meeting and should replace those pages from our August 18, 1986 submittal. Accordingly, a revised Safety Assessment is also included herein.

Should you have any additional questions regarding this subject, do not hesitate to contact us.

Very truly yours,



Attachments

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SAFETY ASSESSMENT

Discussion:

Generic Letter 83-28 was issued by NRC on July 8, 1983 indicating actions to be taken by licensees based on the generic implication of the Salem ATWS events. Item 4.3 of the generic letter requires that modifications be made to improve the reliability of the reactor trip system by implementation of an automatic actuation of the shunt trip attachment on the reactor trip breakers. By letter dated June 14, 1983, the Westinghouse Owners Group (WOG) proposed a generic design modification to implement the automatic shunt trip. By letters dated April 2, 1984 and June 22, 1984, Consolidated Edison provided additional information addressing the plant specific items identified in NRC's August 10, 1983 SER for the WOG's generic shunt trip design. As a condition of the June 22, 1984 SER for the plant specific design, the staff required the submittal of a technical specification change request to require periodic testing of the undervoltage and shunt trip functions and the manual reactor trip switch contacts and wiring following implementation of the modification. A detailed description of the proposed testing was provided by Consolidated Edison letter dated June 22, 1984 and was found acceptable by the staff in NRC's June 22, 1984 SER. On May 23, 1985, NRC issued Generic Letter 85-09 which provided guidance for the preparation of the requested Technical Specification changes. By letter dated February 14, 1986, Consolidated Edison submitted further responses regarding the Technical Specifications and seismic qualification of the automatic shunt trip. In a Supplemental SER transmitted by letter dated June 16, 1986, NRC found Consolidated Edison's response for the seismic qualification issue acceptable and requested that Technical Specification changes responsive to Generic Letter 85-09 be submitted within 60 days of the supplemental SER transmittal date.

The proposed Technical Specification change provides for testing of the undervoltage and shunt trip functions and the manual reactor trip switch contacts and wiring on a refueling frequency as described in our June 22, 1984 letter, for test procedure PT-R51, Revision 1. The proposed Technical Specification change provides for testing of the undervoltage and shunt trip functions on a monthly frequency as described in our June 22, 1984 letter, for test procedure PT-M14A revised to reflect the installation of the automatic shunt trip modification. The proposed Technical Specification revisions are consistent with the guidance contained Generic Letter 85-09.

In addition to the aforementioned Technical Specification changes, two typographical errors were corrected. In amendment No. 107, the first page of Table 3.5-2 was issued as "Table 3.5-2 (1 of 3)" but the subsequent pages were labeled "3.2 (continued)". The correct label should be "3.5-2 (continued)". The other typographical error was in Table 4.1-1, Item No. 29.a which was written as "400V Emergency Bus Undervoltage". The correct channel description should be "480V Emergency Bus Undervoltage"; similar to items 29.B and 29.c. We do not have a 400V bus.

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). Example (ii) of those involving no significant hazards consideration discusses a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications: for example, a more stringent surveillance requirement. The proposed changes to Tables 3.5-2 and 4.1-1 with respect to the reactor trip breakers provide new explicit LCOs and testing requirements consistent with the modified shunt trip design, not previously included in Technical Specifications.

The proposed change does not involve a significant hazards consideration because operation of Indian Point Unit No. 2 in accordance with these changes would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. The technical specification changes submitted reflect plant modifications already implemented and reviewed pursuant to 10 CFR 50.59, and as such are expected to enhance the reliability of the reactor trip breakers to trip on demand. The proposed technical specification changes are consistent with guidance contained in Generic Letter 85-09. In addition, the proposed changes constitute additional controls not presently included in the technical specifications. Therefore, this change will not increase the probability or consequences of an accident.
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed technical specification changes resulted from extensive review and analysis of the Salem ATWS event and are a result of modifications made as recommended by those analyses. The proposed change would not alter the configuration of any of the plant's safety equipment. Therefore, it has been determined that this change will not create the possibility of a new or different kind of accident from that previously evaluated.
- (3) involve a significant reduction in a margin of safety. The modifications made to the plant increase the margin of safety and the proposed technical specifications changes reflect additional conservative administrative controls based on those modifications. Therefore, it has been determined that this change does not involve a significant reduction in a margin of safety.

Therefore, based on the above considerations, and inasmuch as this proposed change is similar to an example for which the Commission has determined no significant hazards considerations exist (i.e., a new limitation or surveillance requirement), we conclude that this proposed change does not constitute a significant hazards consideration.

The proposed changes have been reviewed by Consolidated Edison's Station Nuclear Safety Committee and Nuclear Facilities Safety Committees. Both committees concur that these changes do not represent a significant hazards consideration and will not cause any change in the types or increase in the amounts of effluents or any change in the authorized power level of the facility.