Stephen B. Bram
Vice President

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April 14, 1989

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Supplemental Application for License Amendment to Increase Authorized Power Level (TAC No. 64542)

This letter serves to clarify and correct our March 30, 1989 Supplemental Application, which in turn updated our September 30, 1988 Application for License Amendment. The September 30, 1988 Application, as supplemented on January 10, 1989, requests an amendment to the Indian Point Unit No. 2 License and Technical Specifications to authorize operation of the plant at a core power level up to 3071.4 MWt (Megawatt thermal), which corresponds to the original NSSS power (3083.4 MWt) guaranteed by Westinghouse, the NSSS vendor.

Enclosure 3 to Attachment B (the no significant hazards consideration evaluations) of the March 30, 1989 Supplemental Application contained typographical errors in Sections 1.0 and 2.0. Specifically, on page 2 of Section 1.0 the RCS pressure limit was incorrectly given as 2700 psig instead of 2735 psig, and in Section 2.0 the word "Overpressure" was inadvertently used in place of the word "Overpower" six times. The corrected pages are enclosed in Attachment A to this letter. The foregoing corrections have no effect on the accuracy or correctness of the underlying no significant hazards consideration analyses or conclusions.

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

Very truly yours,

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Attachment

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Attachment A

Revised Pages

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
April, 1989

Con Edison has submitted a license amendment request, dated September 30,1988 (subsequently clarified by a letter dated January 20, 1989), to utilize Westinghouse Optimized Fuel Assemblies (OFA) beginning with Cycle 10 operation. In conjunction with the use of OFA, certain accident analyses were also performed at the stretch rated power conditions. The results of all of the accident analyses indicate that all applicable safety limits will be met at the stretch rated conditions.

1.3 Basis for No Significant Hazards Consideration Determination

The analysis results show that the proposed changes do not involve a significant hazards consideration because the 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. This is based on the original design basis of the plant, as confirmed by the analyses supporting original plant licensure. These include an environmental evaluation which assumed stretch rated conditions and a radiological evaluation conducted at 3216 MWt. These analyses have been further confirmed by analyses performed persuant to the methodology of WCAP-10263, as described above.

(2) create the possibility of a new or different kind of accident from any accident previously evaluated. This is based on the system and components reviews accompanying original plant licensure, as confirmed by analyses recently conducted, all of which verify the capability of systems and components to operate at the stretch rated conditions.

(3) involve a significant reduction in a margin of safety. Accident analyses, both past and present, performed at the stretch rated conditions demonstrate that DNB design basis remains unchanged, that the RCS pressure limit of 2735 psig will not be exceeded, and that LOCA results remain well below the regulatory limits given in 10CFR50.46.

2.0 NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION FOR OVERTEMPERATURE DELTA-T AND OVERPOWER DELTA-T SETPOINTS

2.1 Description of Change

The proposed revision to Technical Specifications 2.3.1.B(4) and 2.3.1.B(5) consists of changes to the nominal average temperature value at rated power for the Overtemperature Delta-T and Overpower Delta-T protection logic functions.

The proposed changes are necessary to reflect the increased average temperature allowed at the increased power level.

2.2 Safety Assessment

The proposed revisions to Technical Specification 2.3.1.B(4) and 2.3.1.B(5) would revise the Delta-T limit at which a reactor trip signal would be produced as a result of increases in Delta-T from either overtemperature or overpower transient conditions. Such a revision does not limit operation flexibility nor affect the safety function of the reactor trip signals on the Delta-T protection. These revisions only change the allowable Delta-T limit functions to be consistent with plant protection required to bound the reactor core safety limits specified for Technical Specification Figure 2.1-1.

All of the licensing basis accidents described in FSAR Chapter 14 which take credit for an Overtemperature Delta-T or Overpower Delta-T reactor trip have been analyzed considering the proposed changes to the Overtemperature Delta-T and Overpower Delta-T setpoint functions as provided in the proposed changes to Technical Specification 2.3.1.B(4) and (5). The results of these analyses demonstrate conformance with the applicable design and regulatory requirements assuming the proposed change for reactor trip on the Delta-T protection setpoint functions.

2.3 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 (vi) of those involving no significant hazards consideration discusses a change which may reduce a safety margin but where the results are clearly within all acceptance criteria with respect to the system or component. The proposed change reflects the increased average temperature allowed at the increased power level.

The results of all analyses show that the proposed changes do not involve a significant hazards consideration because the 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 proposed revision is being supported by conservative evaluation and analyses utilizing the latest approved computer codes and methodology. These analyses demonstrate conformance to the applicable design and regulatory criteria.

(2) create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes to the Overtemperature Delta-T and Overpower Delta-T setpoint functions for reactor trip do not modify the plant's configuration or operation, and therefore the identical postulated accidents are the only ones that require evaluation and resolution. 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.

In general, the proposed changes do not adversely effect the ability of Overtemperature Delta-T and Overpower Delta-T reactor trip signals to perform their safety function to initiate

reactor core shutdown during an Overtemperature Delta-T or Overpower Delta-T transient condition, respectively.

(3) involve a significant reduction in a margin of safety. With the proposed change, all safety criteria previously evaluated are met, remain conservative, and continue to maintain the previous margins of safety.

The safety function of reactor trip on Overtemperature Delta-T and Overpower Delta-T is to initiate reactor core shutdown during Delta-T transient events to ensure that the reactor core safety limits as defined in Technical Specification Figure 2.1-1 are not exceeded. Safety evaluations and analyses for all of the licensing basis accidents described in FSAR Chapter 14 which take credit for an Overtemperature Delta-T or Overpower Delta-T reactor trip have been performed and the results of these analyses demonstrate conformance with the applicable design and regulatory requirements.

Therefore, based on the above, we conclude that the proposed changes do not constitute a significant hazards consideration.