

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION PAGE REVISIONS

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CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
MARCH, 1990

Summary of Changes

1. Replace page vii with attached page vii

Deletes proposed Figure 3.8-1 from List of Figures.

2. Delete page 3.8-2 from original application.

Deletes use of proposed Figure 3.8-1 (therefore no changes are being made to page 3.8-2 of Technical Specifications)

3. Replace page 3.8-4 with attached page 3.8-4

Deletes proposed Specification 3.8.C.2 which contains a maximum spent fuel storage pit temperature. Adds, in its place, proposed Specification 3.8.C.2 requiring a minimum spent fuel storage pit water level.

4. Replace page 3.8-6 with attached page 3.8-6

Deletes bases for proposed spent fuel storage pit temperature limit and use of Figure 3.8-1. Adds basis for proposed minimum spent fuel storage pit water level.

5. Delete Figure 3.8-1

Part of deletion of proposed spent fuel storage pit temperature limit.

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Maximum Pressurizer Level with PORV's Inoperable and One Charging Pump Energized	3.1.2-2
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C. The following conditions are applicable to the spent fuel pit any time it contains irradiated fuel:

1. The spent fuel cask shall not be moved over any region of the spent fuel pit until the cask handling system has been reviewed by the Nuclear Regulatory Commission and found to be acceptable. Furthermore, any load in excess of the nominal weight of a spent fuel storage rack and associated handling tool shall not be moved on or above El. 95' in the Fuel Storage Building. Additionally, loads in excess of the nominal weight of a fuel and control rod assembly and associated handling tool shall not be moved over spent fuel in the spent fuel pit. The weight of installed crane systems shall not be considered part of these loads.
2. The spent fuel storage pit water level shall be maintained at an elevation of at least 93'2". In the event the level decreases below this value, all movement of fuel assemblies in the spent fuel pool storage pit and crane operations with loads over spent fuel in the spent fuel pit shall cease and water level shall be restored to within its limit within 4 hours.

D. The following conditions are applicable to the spent fuel pit anytime it contains fuel:

1. The spent fuel storage racks are categorized as either Region I or Region II as specified in Figure 3.8-2. Fuel assemblies to be stored in the spent fuel storage racks are categorized as either Category A, B or C based on burnup and enrichment limits as specified in Figure 3.8-3. The storage of Category A fuel assemblies within the spent fuel storage racks is unrestricted. Category B fuel assemblies shall only be stored in Region I or in a Region II spent fuel rack cell with one cell wall adjacent to a non-fuel area (a non-fuel area is the cask area or the area on the outside of a rack next to a wall). Category C fuel assemblies shall be stored only in Region I. The one exception to this shall be fuel assembly F-65 which shall be stored in Region I or in a Region II spent fuel rack cell with two cell walls adjacent to non-fuel areas.

In the event any fuel assembly is found to be stored in a configuration other than specified, immediate action shall be initiated to:

- a. Verify the spent fuel storage pit boron concentration meets the requirements of Specification 3.8.D.2, and
- b. Return the stored fuel assembly to the specified configuration.

The 131-hour decay time following plant shutdown and the 23 feet of water above the top of the reactor vessel flanges are consistent with the assumptions used in the dose calculations for fuel-handling accidents both inside and outside of the containment. The analysis of the fuel handling accident inside of the containment is based on an atmospheric dispersion factor ( $X/Q$ ) of  $5.1 \times 10^{-4} \text{ sec/m}^3$  and takes no credit for removal of radioactive iodine by charcoal filters. The requirement for the fuel storage building charcoal filtration system to be operating when spent fuel movement is being made provides added assurance that the offsite doses will be within acceptable limits in the event of a fuel-handling accident. The additional month of spent fuel decay time will provide the same assurance that the offsite doses are within acceptable limits and therefore the charcoal filtration system would not be required to be operating.

The spent fuel storage pit water level requirement in Specification 3.8.C.2 provides approximately 24 feet of water above fuel assemblies stored in the spent fuel storage racks.

The fuel enrichment and burnup limits in Specification 3.8.D.1 and the boron requirements in Specification 3.8.D.2 assure the limits assumed in the spent fuel storage safety analysis will not be exceeded.

The requirement that at least one RHR pump and heat exchanger be in operation ensures that sufficient cooling capacity is available to maintain reactor coolant temperature below  $140^\circ\text{F}$ , and sufficient coolant circulation is maintained through the reactor core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR pumps and heat exchangers operable when there is less than 23 feet of water above the vessel flange ensures that a single failure will not result in a complete loss of residual heat removal capability. With the head removed and at least 23 feet of water above the flange, a large heat sink is available for core cooling, thus allowing adequate time to initiate actions to cool the core in the event of a single failure.

The presence of a licensed senior reactor operator at the site and designated in charge provides qualified supervision of the refueling operation during changes in core geometry.

#### Reference

- 1) FSAR Section 9.5.2

ATTACHMENT II  
SUPPLEMENTAL INFORMATION TO APPLICATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
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Remotely engagable lift rigs will be used to lift the racks for the proposed rerack. These rigs consist of a box frame with four lift rods which extend to the rack baseplate. The frame is not a primary load bearing member of the lifting rigs. It carries only secondary in-plane loads which are essentially the reaction forces to equilibrate the horizontal component of the tension in the slings. Each lifting rod is attached to the crane hook by an independent sling. In the event of a single failure of a lift rod and/or its associated sling, the three remaining lift rods with associated slings are capable of holding the load. Therefore, the lift rig is a dual lifting device since a single component failure or malfunction will not result in uncontrolled lowering of the load.

The lift rigs meet the requirements of NUREG 0612 Section 5.1.6(1)(a) in that the rigs meet ANSI N14.6-1978 and Section 5.1.1(4) of NUREG 0612. As stated above, the lift rig is a dual device.

The slings to be used will meet NUREG 0612 Section 5.1.6(1)(b). The slings will meet ANSI B30.9-1971 as specified in Section 5.1.1(5) of NUREG 0612 and the slings will be rated for a load twice what is called for in meeting Section 5.1.1(5) of NUREG 0612.

The interfacing lift points meet NUREG 0612 Section 5.1.6(3) in that duality is provided such that a single lift point failure will not result in uncontrolled lowering of the load. Lift points have a design safety factor with respect to ultimate strength of five times the maximum combined concurrent static and dynamic load after taking the single lift point failure.