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Vice President

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March 7, 1991

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: Proposed Changes to Technical Specifications  
Regarding Pressure-Temperature (P-T) Limits and  
Overpressure Protection System (OPS) Parameters

Transmitted herewith are the original and two (2) copies of an "Application for Amendment to the Operating License", sworn to on March 7, 1991. This Application requests an Amendment to the Con Edison, Indian Point Unit No. 2 Technical Specifications. In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State Official.

This application for amendment to the Indian Point 2 Technical Specifications seeks to amend Section 3.1.A.1 (Reactor Coolant Pump), Section 3.1.A.4 (Overpressure Protection System), Section 3.1.B (Heatup and Cooldown), Section 3.1.C (Minimum Conditions for Criticality), Section 3.2.D (CVCS), Section 3.3.A.3 (Safety Injection), and Section 4.3 (Reactor Coolant System Integrity Testing). These changes are being made to incorporate revised pressure-temperature limits and Overpressure Protection System (OPS) parameters. These revisions are being made in accordance with Reference 1, which required that licensees use the methodology of Regulatory Guide (RG) 1.99 Revision 2, "Radiation Embrittlement of Reactor Vessel Material," to predict the effect of neutron radiation on reactor vessel materials. Also, Section 3.1.C is being amended to replace pressure-temperature requirements on the reactor coolant system when the reactor is critical, with a fixed temperature limit.

The proposed changes are contained in Attachment I to the Application for Amendment enclosed with this letter, while the associated Safety Assessment is provided in Attachment II. Attachment III "Heatup and Cooldown Limit Curves for the Consolidated Edison Company Indian Point Unit 2 Reactor Vessel", WCAP-12796 describes the methodology used in developing the pressure-temperature curves. Attachment IV, "Revised OPS Setpoints for Indian Point Unit 2" describes the methods used in developing the OPS curves and tables.

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Since these changes are required for startup following our current refueling outage, we request an expeditious review by May 15, 1991. Should you have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



Reference:

NRC Generic Letter 88-11, NRC Position on Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations, July 12, 1988.

Attachments

cc: Mr. Thomas T. Martin  
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