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May 29, 1992

e: 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 in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle

Transmitted herewith are the original and two (2) copies of an "Application for Amendment to the Operating License" sworn to on May 29, 1992. 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 Officials.

This application for amendment to the Indian Point 2 Technical Specification seeks to amend the definition of a "Refueling Interval", "R", in Table 1.1 of Section 1.0 "Definitions" to 24 months consistent with a 24 month fuel cycle. Consistent with this change, all existing references in Section 4.0 "Surveillance Requirements" would be revised to "R" or "at least once every Refueling Interval". These changes are being sought consistent with the guidance of Generic Letter 91-04, and would continue the existing provision permitting extension of surveillances by 25% of the specified interval. This would extend the time limit for completing these surveillances from the existing 22.5 months to a maximum of 30 months. Excluded from the 25% extension are those surveillances required by Appendix J to 10 CFR 50 and steam generator surveillances.

The proposed changes are contained in Attachment A to the application for amendment enclosed with this letter. There are 32 surveillances which come due prior to commencement of the next refueling outage on February 1, 1993. These are the highest priority and their associated Safety Assessments are provided in Attachment B and are highlighted by a # sign in Attachment A. These must be addressed prior to November 21, 1992 or it would become necessary to conduct these surveillances by that date. We have evaluated these high priority surveillances extensively and believe that this submittal facilitates a timely NRC review. However, if NRC is unable to complete its review by that date, in the alternative we request a one-time-only extension of the surveillance interval for the referenced 32 surveillances until February 1, 1993.



The remaining Safety Assessments will be submitted on a staggered basis throughout the year. It is our objective to obtain NRC approval of the entire amendment by February 1993. Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

Attachments

cc: Mr. Thomas T. Martin
Regional Administrator - Region I
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