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November 25, 1992

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

REFERENCES:

- 1) Con Edison Letter dated May 29, 1992; Same Subject.
- 2) Con Edison Letter dated July 29, 1992; Same Subject.

By references 1 and 2, Con Edison submitted proposed amendments to the IP2 Technical Specifications intended to implement surveillance intervals to accommodate a 24 month fuel cycle. As requested by the NRC project manager, Mr. F. Williams, we have merged the above referenced submittals into one amendment which is enclosure 1. All revision bars and text have been appropriately revised.

Also, please be advised of the following, corresponding to the NRC Generic Letter 91-04 requirements:

1. Item 4 of enclosure 2 to Generic Letter 91-04.

In all instrument drift evaluations, a comparison of the projected instrument drift errors was made with the values of drift used in the setpoint analysis. Where the projected instrument drift could be accommodated within the existing Technical Specification values (and therefore current Safety Analysis limits) this was noted in the No Significant Hazards evaluation section of the referenced submittals. If the projected drift could not be accommodated within existing Technical Specification limits, these limits were revised. In all such instances, checks were performed to ensure that Safety Analysis limits would not be exceeded. In one instance, Pressurizer Hi-Pressure Reactor Trip, a Safety Analysis assumption was affected which required re-analysis. This re-analysis demonstrated that Safety Analysis limits were not exceeded.

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All of the evaluations were performed in accordance with Westinghouse methodology, which we understand is consistent with NRC Regulatory Guide 1.105, and has been accepted by the NRC.

2. Item 5 of enclosure 2 to Generic Letter 91-04.

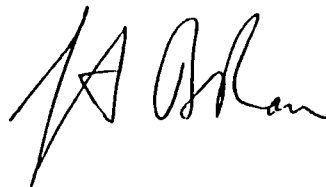
As part of the overall program to address the requirements of NRC Generic Letter 91-04 for implementation of a 24 month fuel cycle, we have evaluated the impact of instrument drift for an extended operating cycle upon control functions such as pressurizer level control, temperature control and steam generator level. No Technical Specification limits are involved in this evaluation cycle. For the effort completed to date (i.e., those surveillances that are due prior to the 1993 refueling shutdown, references 1 and 2), there is no impact on the ability to shutdown the plant. It is anticipated that this conclusion will not change through the remainder of the program (scheduled for completion prior to the 1993 refueling outage). However, any impacts in this area will be addressed in future submittals.

3. Item 6 of enclosure 2 to Generic Letter 91-04.

As stated in a previous Con Edison letter dated November 5, 1992, surveillance test procedures covered by references 1 and 2 will reflect criteria based on statistical analysis of historical data and channel statistical analysis. This will include any revisions to the criteria due to the historical data review. Engineering judgement will be used to specify surveillance criteria more conservative than the maximum statistical allowance. In all instances the Safety Analysis limits were reviewed and are preserved intact, with respect to the surveillance procedure criteria. No revision of Safety Analysis assumptions has been necessary.

Should you have any questions regarding this matter, please contact Mr. Charles. W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in dark ink, appearing to read "A. Jackson", is written below the closing text.

cc: Mr. Thomas T. Martin
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