

Attachment A

Technical Specification Page Revisions
concerning
Inservice Inspection and Testing
(Supercedes May 5, 1977 and February 16, 1984 submittals)

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
July, 1986

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4.2 Inservice Inspection and Testing

Applicability

Applies to the inservice inspection of Quality Groups* A,B and C components and the inservice testing of pumps and valves whose function is required for safety.

Objective

To provide assurance of the continued integrity and/or operability of those structures, systems, and components to which this specification is applicable.

Specification

4.2.1 Inservice Testing

Inservice testing of pumps and valves whose function is required for safety shall be performed in accordance with the applicable edition and addenda of Section XI of the ASME Boiler and Pressure vessel Code as required by 10 CFR 50, Section 50.55a(g).

4.2.2 Inservice Inspection

Inservice inspection of Quality Group* A, B, and C components shall be performed in accordance with the applicable edition and addenda of Section XI of the ASME Boiler and Pressure Vessel Code as required by 10 CFR 50, Section 50.55a(g).

4.2.3 Primary Pump Flywheels

The flywheels shall be visually examined at the first refueling. At each subsequent refueling, one different flywheel shall be examined by ultrasonic methods. The examinations schedules are shown in Table 4.2-1.

4.2.4 Reactor Vessel Special Inspection

1. Interval of Inspection:

The reactor vessel shall be examined during the second ten year interval in the area of the vessel weld located approximately 236 inches below the reactor vessel flange at 345° azimuth. This area shall be reexamined during the three successive inspection periods as defined in accordance with IWB-2410 of the 1980 ASME Boiler & Pressure Vessel Code, Section XI, as modified below.

The examination schedule may revert to the original inspection schedule per IWB-2410 if:

- (i) The additional examinations reveal that the indications remain essentially unchanged over 3 successive inspections, or
- (ii) Any additional examination utilizing-ultrasonic techniques per IWA-2232, or alternative techniques per IWA-2240, as supplemented by prior examination, demonstrate that the reflector meets the acceptance standards of IWB-3510. Such demonstration shall be submitted for NRC review and approval. Upon receipt of NRC concurrence, this special inspection requirement (4.2.4 in its entirety) shall become void.

2. Reporting Requirements:

The reactor vessel inservice inspection program shall be forwarded to NRC 180 days prior to plant shutdown during which the inspection is scheduled to be accomplished. Inspection results shall be forwarded for NRC review and approval 15 days prior to plant startup.

*Quality Group classification is in accordance with Revision 3 of Regulatory Guide 1.26.

References

- (1) Letter from Robert W. Reid of NRC to William J. Cahill of Consolidated Edison dated April 22, 1976
- (2) Letter from Robert W. Reid of NRC to William J. Cahill of Consolidated Edison dated November 17, 1976
- (3) Letter from William J. Cahill of Consolidated Edison to Robert W. Reid of NRC dated May 27, 1976

Table 4.2-1

<u>No. Item</u>	<u>Examination Category</u>	<u>Components and Part to be Examined</u>	<u>Method</u>	<u>Extent of Examination (Percent in 10 Year Interval)</u>	<u>Remarks</u>
4.2.3	N/A	Primary pump flywheel	V & UT	See Remarks	The flywheels shall be visually examined at the first refueling. At each each subsequent refueling, one different flywheel shall be examined by ultrasonic methods.
4.2.4	N/A	Reactor Vessel Special Inspection Area	UT	See Remarks	<p>The reactor vessel shall be examined during the second ten year interval in the area of the vessel weld located approximately 236 inches below the reactor vessel flange at 345° azimuth. This area shall be reexamined during the three successive inspection periods as defined in accordance with IWB-2410 of the 1980 ASME Boiler & Pressure Vessel Code, Section XI as modified below.</p> <p>The examination schedule may revert to the original inspection schedule per IWB-2410 if:</p> <p>(1) The additional examinations reveal that the indications remain unchanged over 3 successive inspections, or</p>

Amendment No.

Table 4.2-1 (cont'd)

<u>No. Item</u>	<u>Examination Category</u>	<u>Components and Part to be Examined</u>	<u>Method</u>	<u>Extent of Examination (Percent in 10 Year Interval)</u>	<u>Remarks</u>
					<p>(ii) Any additional examination utilizing ultrasonic techniques per IWA-2232, or alternative techniques per IWA-2240, as supplemented by prior examination, demonstrate that the reflector meets the acceptance standards of IWB-3510. Such demonstration shall be submitted for NRC review and approval. Upon receipt of NRC concurrence, this special inspection requirement shall become void.</p>

Safety Assessment

In the fall of 1976, the NRC sent guidance to licensees regarding implementation of the revised 10 CFR 50.55a including submission of proposed Technical Specification changes to incorporate standard language referencing 10 CFR 50.55a(g). The Regulation was changed to ensure that examination and testing requirements for operating facilities are periodically updated to later approved editions and addenda of Section XI. By letter dated May 5, 1977 Consolidated Edison submitted proposed changes to the Technical Specifications for Indian Point Unit No. 2 responsive to NRCs guidance. Subsequently, the periodic updating schedule contained in 10 CFR 50.55a(g) was revised and by letter dated February 16, 1984 Consolidated Edison submitted a revision to the May 5, 1977 submittal responsive to these changes. During the course of NRCs review of the February 16, 1984 submittal certain changes were identified that would better facilitate implementation of the proposed Technical Specification. This revision to the May 5, 1977 submittal incorporates those changes as well as those relating to the reactor vessel special inspection resulting from the indication identified during the cycle 6/7 inspection.

Basis for proposed no significant hazards consideration determination.

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant hazards considerations if operation of the facility in accordance with a proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed change will substitute (by reference) a revised and more comprehensive inservice inspection and testing program satisfying the requirements of 10 CFR 50.55a(g) in place of the program currently existing in the Technical Specifications. The existing program is based on the 1970 edition of ASME B&PV Code Section XI which was the code in effect at the time the plant was originally licensed. The new program is based on the 1980 edition of ASME B&PV Code Section XI with addenda through Winter 1981. The code (and therefore the revised program) has evolved and expanded with time to reflect technological changes in inspection and testing that have developed. The revised program represents an overall improvement in the application of inspection and testing technology. As such the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated. The updated inspection and testing methods can be expected to enhance the early identification of impending failure modes thereby reducing the probability or consequences of previously evaluated accidents. The proposed inspection and testing program does not vary or affect any plant operation condition or parameter therefore it will not

create the possibility of a new or different kind of accident from any previously evaluated. Finally the proposed program does not change the design basis for any equipment in the plant therefore it does not involve a significant reduction in a margin of safety.

The proposed amendment is consistent with three of the examples for which the Commission has, in its guidance to licensees, determined that no significant hazards consideration exists. In so far as the proposed change would substitute a reference to a revised inspection and testing program consistent with 10 CFR 50.55a(g) in lieu of the existing program detailed in the Technical Specifications, the proposed change is consistent with example (i) to the extent that it is purely administrative. To the extent that the proposed change would enhance the inservice inspection and testing program as required by 10 CFR 50.55a(g) it is consistent with examples (ii) and (vii). In so far as the revised program is broader in scope it represents an additional limitation not presently in Technical Specifications. Finally the change is indeed necessary to conform the license to changes in the regulations (i.e. 10 CFR 50.55a(g)).

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