

Table 4.1-2

Frequencies for Sampling Tests

	Check	Frequency	Maximum Time Between Tests	
1.	Reactor Coolant Samples	Gross Activity (1) Radiochemical(2) E Determination Tritium Activity F, Cl & O <sub>2</sub>	5 days/week (1) Monthly Semi-annually (3) Weekly (1) Weekly	3 days 45 days 30 weeks 10 days 10 days
2.	Reactor Coolant Boron	Boron Concentration	Twice/week	5 days
3.	Refueling Water Storage Tank Water Sample	Boron Concentration	Monthly	45 days
4.	Boric Acid Tank	Boron Concentration	Twice/week	5 days
5.	DELETED			
6.	DELETED			
7.	Accumulator	Boron Concentration	Monthly	45 days
8.	Spent Fuel Pit	Boron Concentration	Monthly	45 days
9.	Secondary Coolant	Iodine-131	Weekly (4)	10 days
10.	Containment Iodine- Particulate Monitor or Gas Monitor	Iodine-131 and Particulate Activity or Gross Gaseous Activity	Continuous When Above Cold Shutdown(5)	NA*

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## Safety Assessment

Subsequent to Con Edison's request of August 22, 1996 supplemented by a March 28, 1997 submittal, the Nuclear Regulatory Commission issued Amendment 191 to the Indian Point Unit No. 2 Technical Specifications authorizing the elimination of the requirement for the NaOH containment spray additive and the spray additive tank. Our request for this change inadvertently omitted a request for the deletion of the requirement to sample the spray additive tank per Table 4.1-2 of the Technical Specifications.

Since the need for the use of the spray additive tank has been eliminated, the safety-relatedness of the requirement to periodically test the contents of the tank is inapplicable. This line item #6 in Table 4.1-2 can therefore be deleted with no potential adverse effects on the health and safety of the public.

### Determination of No Significant Hazards Consideration

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). Example (vi) of those involving no significant hazards consideration discusses a change which may reduce a safety margin but where the results are clearly within all acceptable criteria with respect to the system or component. Similarly, the proposed change to remove the requirement to test the spray additive tank is consistent with NRC's issuance of Amendment 191 which approved the removal of the spray additive tank to which the testing is solely applicable. Consistent with the Commission's criteria in 10 CFR 50.92, we have determined that the proposed change does not involve a significant hazards consideration because the operation of Indian Point Unit No. 2 in accordance with this change would not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated. Since the removal of the spray additive tank has been analyzed and approved, there is no further basis for continued testing of the tank after content and tank removal.
- 2) create the probability of a new or different kind of accident from any accident previously evaluated. The proposed change allows the containment safeguards to mitigate the consequences of a design basis LOCA in a manner equivalent to that previously approved.
- 3) involve a significant reduction in a margin of safety. With the proposed change, all safety criteria previously evaluated are still met and remain conservative.

Therefore, based on the above, we conclude that the proposed changes do not constitute a significant hazards consideration.