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Vice President

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June 17, 1997

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: Indian Point 2 License Amendment Request,
Technical Specifications Section 3.10, On-Line
Calibration of Rod Position Indicators (RPIs)

The Technical Specifications for Consolidated Edison's Indian Point Unit No. 2 facility, section 3.10, currently permit utilization of on-line calibration for rod position indication. This Technical Specification, however, is limited to fuel cycle 13 pending NRC's approval of Con Edison's request for approval of Technical Specifications authorizing on-line rod calibration on a permanent basis. The current approval for cycle 13 does not apply to cycle 14, which will commence upon recovery from the current refueling outage. On December 11, 1996, Con Edison requested, with supporting documentation, authorization to perform on-line calibration for cycle 14. This request was supplemented with additional information on April 14, 1997.

The ability to calibrate on-line improves the calibration procedure and also results in approximately a two day reduction in return to service from a refueling outage. On-line calibration was found not to involve a significant hazards consideration under 10CFR50.92 at the time it was approved for cycle 13. Indian Point 2 is currently scheduled to return to service from the current cycle 13/14 refueling outage on June 25, 1997, coincident with the expected summer peak demands for electricity in the New York metropolitan area. Absent approval to perform on-line calibration as in the past, and as requested, the return to service would be delayed.

It is Con Edison's understanding that the regulatory staff is prepared to issue our requested license amendment, subject only (for reasons beyond the control of Con Edison) to completion of procedures for public pre-notice. To Con Edison's knowledge, the pre-noticing that occurred in connection with the earlier approval of the procedure for cycle 13 did not result in any public comments, and on this basis Con Edison does not anticipate that there would be public comment on the current application were pre-noticing to occur.

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As permitted by 10CFR50.91(a)(6), Con Edison hereby requests that the amendment to the Technical specifications permitting on-line RPI calibration for Indian Point 2 for cycle 14 be issued on an exigent basis to avoid undue delay in the return to service of Indian Point 2, and resultant hardship to Con Edison's ratepayers. Since the action presently being requested of the NRC -- issuance of approval to perform on-line RPI calibration -- has previously been reviewed, publicly noticed without subsequent public comment, approved with an accompanying finding that no significant hazards considerations were presented, and successfully implemented during cycle 13, there is no safety significance to proceeding on an exigent basis for the cycle 14 approval.

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

Very truly yours,



cc: Mr. Hubert J. Miller
Regional Administrator - Region I
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