

3. If the requirements of 3.7.C.1 or 3.7.C.2 cannot be met, then, within the next seven (7) days, either the inoperable condition shall be corrected or an alternate independent power system shall be established.
4. If the requirements of 3.7.C.3 cannot be satisfied, the reactor shall be placed in the hot shutdown condition utilizing normal operating procedures. If the requirements of 3.7.C.3 cannot be met within an additional 48 hours, the reactor shall be placed in the cold shutdown condition utilizing normal operating procedures.

The requirements of Specification 3.7.A may be modified for an emergency "Black Start" of the unit by using the requirements of either Specification 3.7.D.1 or 3.7.D.2 below:

- D.1.
 - a. all 138 kV lines to Buchanan de-energized,
 - b. the 13.8 kV line de-energized,
 - c. the 6.9 kV buses 5 and 6 energized from the onsite gas turbine through the 13.8/6.9 kV transformer,
 - d. the four 480-volt buses 2A, 3A, 5A and 6A energized from the diesels and the tie breakers between buses 5A and 2A and between buses 3A and 6A open,
 - e. three diesel generators operable with a minimum onsite supply of 6,334 gallons of fuel available in each of the individual storage tanks and 29,000 gallons of fuel available at the Buchanan Substation, or onsite other than the normal supply tanks,
 - f. station batteries Nos. 21, 22, 23 & 24 and their associated battery chargers and dc distribution systems operable, and
 - g. the 480-volt supply breakers 52/2A, 52/3A, 52/5A and 52/6A open.
- D.2.
 - a. establish 138 kV bus sections at Buchanan with at least 37 MW power (nameplate rating) from any combination of gas turbines at Buchanan and onsite,

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6.2.2 Facility Staff

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. All core alterations after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling. This individual shall have no other concurrent responsibilities during this operation.
- f. DELETED
- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

- h. The Operations Manager or Assistant Operations Manager shall hold a senior reactor operator license.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Operation Manager's and the Assistant Operations Manager's SRO license requirement which shall be in accordance with Technical Specification 6.2.2.h, and, (2) the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 The Plant Manager shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3 The Watch Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 DELETED

6.5 REVIEW AND AUDIT

6.5.1 Station Nuclear Safety Committee (SNSC)

Function

6.5.1.1 The Station Nuclear Safety Committee shall function to advise the Vice President-Nuclear Power on all matters related to nuclear safety.

ATTACHMENT II
SAFETY ASSESSMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
JANUARY 1999

Description of Proposed Changes:

- A) Technical Specification 3.7.D.1.g: replace the word “tie” in the following sentence with the word “supply”; “the 480-volt tie breakers 52/2A, 52/3A, 52/5A and 52/6A open”.

The 480-volt breakers referred to in Section 3.7.D.1.g are the normal 480-volt supply breakers to the 480-volt busses, they are not tie breakers.

Basis for No Significant Hazards Consideration Determination

The proposed change does not involve a significant hazards consideration because:

- 1. There is no significant increase in the probability or consequences of an accident previously evaluated.**

The proposed amendment is administrative in nature. It involves making an editorial change to provide the correct functional description of the breakers. This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed change to the subject Technical Specification would not increase the probability or consequences of an accident previously evaluated.

- 2. The possibility of a new or different kind of accident from any accident previously evaluated has not been created.**

As stated above, the proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently, no new failure modes are introduced as a result of the proposed change. Therefore, the proposed change will not initiate any new or different kind of accident.

- 3. There has been no significant reduction in the margin of safety.**

The proposed change is administrative in nature. Since there are no changes to the operation of the facility or physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, and Technical Specification Bases are not affected. Therefore, the proposed change will not result in a reduction in the margin of safety.

B) Technical Specification 6.2.2.h: add the words “or Assistant Operation Manager” after the word Manager in the following sentence: “The Operations Manager shall hold a senior reactor operators license.”

Technical Specification 6.2.2.h currently requires the Operations Manager (OM) to hold a Senior Reactor Operator’s (SRO) license. Con Edison proposes to modify this requirement to have the Operations Manager or the Assistant Operations Manager (AOM) hold an SRO license. Current practice at Indian Point 2 is to have two SRO licensed positions in charge of shift activities. These two positions are the Senior Reactor Operator and the Senior Watch Supervisor (SWS). The AOM is directly in the reporting hierarchy between the SWS and the OM. The day to day activities of the Operations Department are carried out under the direction of the AOM. Thereby, by requiring the OM or the AOM to hold an SRO license there is assurance that the SWS’s will report to an individual with an SRO license. In addition, NUREG-1431, Rev. 1, STANDARD TECHNICAL SPECIFICATIONS - WESTINGHOUSE PLANTS, Section 5.2.2.f states “The [Operations Manager or Assistant Operations Manager] shall hold an SRO license”. This proposed change is consistent with Section 5.2.2.f of the NUREG-1431. Since the OM will be required to meet or exceed all other ANSI N18.1-1971 minimum qualification requirements, there is assurance that the OM will be a knowledgeable and qualified individual. By requiring the alternative that the AOM hold an SRO license, there is assurance that the high level management within the Operations Department will maintain a knowledge of current plant systems and operation. This technical specification change is expected to enhance the OM’s ability to effectively carry out the primary responsibilities of that position, and to have an overall positive effect on the safe and efficient operation of Indian Point 2.

Basis for No Significant Hazards Consideration Determination

The proposed changes do not involve a significant hazards consideration because:

1. There is no significant increase in the probability or consequences of an accident previously evaluated.

This proposed change is administrative in nature. The individual who provides the day to day direction of the activities of the operating shift will still possess an SRO license and this proposed change is consistent with the statement in NUREG-1431, Section 5.2.2.f.

This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed change to the subject Technical Specification would not increase the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any accident previously evaluated has not been created.

The proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently, no new failure modes are introduced as a result of the proposed changes. Therefore, the proposed change will not initiate any new or different kind of accident.

3. There has been no significant reduction in the margin of safety.

The proposed change is administrative in nature. Since there are no changes to the operation of the facility or physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed changes will not result in a reduction in the margin of safety.

C) Technical Specification 6.3.1: change to read as follows: "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975, and (2) the Operations Manager and Assistant Operations Manager who shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except for the SRO license requirement which shall be in accordance with Technical Specification 6.2.2.h."

Since the Operations Manager is no longer required meet all the qualifications of "Operations Manager" listed in ANSI N18.1-1971, Con Edison proposes to modify Technical Specification 6.3.1. The ANSI N18.1-1971 qualifications for "Operations Manager" include a requirement that the Operations Manager, at the time of appointment to the active position, hold an SRO license. Con Edison proposes to modify Technical Specification 6.3.1 to state that the Operations Manager shall meet or exceed all the minimum ANSI N18.1-1971 qualifications except for the SRO license requirement which shall be in accordance with the technical specifications. This will allow an individual who does not hold a current SRO license to be appointed Operations Manager provided all other qualifications of ANSI N18.1-1971 are met.

Basis for No Significant Hazards Consideration Determination

The proposed changes do not involve a significant hazards consideration because:

1. There is no significant increase in the probability or consequences of an accident previously evaluated.

This proposed change is administrative in nature. The individual who provides the day to day direction of the activities of the operating shift will still possess an SRO license and this proposed change is consistent with the statement in NUREG-1431, Section 5.2.2.f.

This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed change to the subject Technical Specification would not increase the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any accident previously evaluated has not been created.

The proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently, no new failure modes are introduced as a result of the proposed changes. Therefore, the proposed change will not initiate any new or different kind of accident.

3. There has been no significant reduction in the margin of safety.

The proposed change is administrative in nature. Since there are no changes to the operation of the facility or physical design the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed changes will not result in a reduction in the margin of safety.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.