

March 26, 1999

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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 Amendment to Allow a One-Time Extension of Technical  
Specification Surveillance Intervals

This Application for Amendment to the Indian Point 2 (IP2) Facility Operating License DPR-26 and Technical Specifications proposes to revise Table 1-1 to add a "Refueling Interval (R##)" designation to allow a one-time extension of the surveillance test intervals for the tests so annotated in the proposed changes. In addition to revising Table 1-1, the proposed amendment would provide specific revisions to Facility Operating License DPR-26 License Condition 2.L.2, and to Technical Specifications Table 4.1-1: Items 13, 27.a and 34; Table 4.1-3: Items 3, 4, and 5; and Sections 4.5.A.1, 4.5.B.1, 4.5.E.4.b (footnote), 4.4.B, 4.4.D.1.c, 4.4.G, 4.4.H.1.a.(2), 4.5.C.1, 4.6.A.2, 4.6.A.3, 4.6.C.4, 4.12.A, 4.12.B, and 4.12.D. If approved, the referenced functional tests would be deferred until the next scheduled refueling outage, which will commence no later than June 3, 2000.

In 1992, Con Edison undertook an extensive program to revise the Technical Specification Surveillance intervals associated with a refueling outage, to 24 months (+25%), in accordance with NRC Generic Letter 91-04. Currently, it is proposed that some of these surveillances be extended on a one-time basis to a total of thirty-seven (37) months. The increase in surveillance interval of seven (7) months is due to an outage during 1998 which extended the operating cycle of the core so that the next refueling outage is now scheduled for June of 2000. The previous refueling outage concluded in June of 1997. Without this one-time extension, an otherwise unnecessary plant outage would be required to perform these surveillances.

The evaluations of acceptability of the requested surveillance test interval extensions are contained in the enclosed Safety Assessments. Past tests have been evaluated, and the results of these evaluations support the one time extension. Although some specific problems were identified, none of these had any significant impact on safety or protection of the core. These tests are designated as refueling shutdown tests since they cannot be performed with the unit at power for one or more of the following reasons: the test process exposes personnel to unnecessary radiation, heat, or safety hazards; Technical

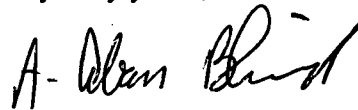
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Specifications limit the number of components or time available for testing and subsequent recovery; the test process would interfere with unit operation, result in inaccurate test results or be hazardous to safe nuclear operation (e.g. Unit Trip, breach of coolant systems, etc.). Therefore, without this one-time extension, an otherwise unnecessary outage of the unit would be required to perform the testing.

Transmitted herewith are the proposed Revised Technical Specification Pages (Attachment A), Safety Assessments (Attachments B through Q), and Summary of the Proposed Change (Attachment R).

Should you have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety and Licensing.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Alan Burt".

cc: Mr. Hubert J. Miller  
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