A. Alan Blind
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5718
blinda@coned.com

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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 20555-0001

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

Reference: 1) Con Edison Letter to USNRC dated March 26, 1999 entitled "Proposed Amendment to Allow a One Time Extension of Technical Specification Surveillance Intervals"

2) Con Edison Letter to USNRC dated June 4, 1993 entitled "NRC Generic Letter 91-04, 24 Month Technical Specification Surveillance Program"

This application for a Technical Specification amendment supplements an earlier amendment request (Reference 1) for a one time extension of intervals for surveillances associated with refueling outages which concerned non-instrument channels. This submittal is limited to the performance of calibrations and tests of instrument channels. The surveillance testing intervals that this amendment would extend begin to come due on November 7, 1999. Therefore it is requested that this proposed amendment receive an expedited review.

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 a maintenance outage during 1998, which extended the operating cycle of the core so that the next refueling outage is now scheduled no later than June 3, 2000. The previous refueling outage concluded in June of 1997. The impact of this extended outage upon the operability of the affected channels is considered negligible based upon channel checks, functional tests, operator rounds and system operation independent of plant status. Without this one time extension, an unnecessary plant outage would be required to perform these surveillances.

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For most instrument channels of concern, an assessment of instrument drift, which would be associated with a longer operating cycle of 37 months, has been performed and found to be acceptable. This assessment based upon Westinghouse Methodology previously reviewed and approved by the NRC, is discussed in further detail in Attachment B. In each instance, drift has been determined with a high probability and confidence level in a graded approach. This graded approach is in accordance with ISA SP67.04-Part II, 1994, and was submitted to the NRC via Reference 2. For a few channels, drift assessment is not applicable. These channels were evaluated based upon the acceptability of past test results, anomalies noted during operation or the applicability of quarterly tests.

This Application for Amendment to the Indian Point 2 (IP-2) Technical Specification proposes to revise Table 4.1-1, Items 4, 5, 6, 7, 8, 11, 13, 17, 21a, 21b, 21e, 22a, 22b, 23, 29a, 29b, 29c, 30a, 30c, 36, and 37. In most instances, it has not been found necessary to request an extension for the entire channel. Rather, it is proposed that the portions of the instrument loop, which are accessible under power operation and can be safely tested, continue to be surveilled per the current 24-month requirement. It is only for inaccessible components or those instrument channels whose surveillance would present a high risk of trip if performed at power, such as transmitters or calibration of the over power/over temperature delta T functions, that a one time extension to the surveillance interval is sought. The proposed revised Technical Specification pages reflect this approach.

It should be noted that a proposed amendment to Technical Specification Table 1-1 adding the Refueling Interval (R##) notation was requested in Reference 1. The R## notation designates those surveillances to be performed at least once every 24 months except a one time extension of the test interval to allow the test to be performed during the refueling outage starting no later than June 3, 2000. The applicable instrument channels found on Table 4.1-1, have been annotated (See Attachment A).

Enclosed herewith are the proposed revised Technical Specification pages, Safety Assessments and summary of the proposed revisions.

No new regulatory commitments are being made by Con Edison in this correspondence.

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

Sincerely yours,

A. Alan Blind

Attachments

C: Mr. Hubert J. Miller
Regional Administrator – Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey F. Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

Mayor, Village of Buchanan
236 Tate Avenue
Buchanan, NY 10511

Mr. Jack Spath
New York State Energy Research and Development Authority
Corporate Plaza West
286 Washington Ave Extension
Albany, NY 12223-6399