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August 25, 1999

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: Supplemental Information for Proposed Technical Specification
Amendment Regarding the Relocation of Administrative Controls
Related to Quality Assurance

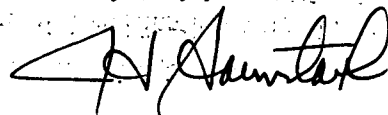
Reference: Con Edison Letter to USNRC dated June 2, 1999

By letter dated June 2, 1999, Consolidated Edison Company of New York, Inc., (Con Edison) submitted an application for Technical Specification amendment to revise Section 6.0 of the Indian Point Unit No. 2 (IP-2) Technical Specifications. This amendment seeks the relocation of select Technical Specification Administrative Controls related to quality assurance to the Quality Assurance Program Description (QAPD). Subsequent to the application submittal, Con Edison received questions from the staff relative to the requested revisions. In response to those inquiries we are providing supplemental information in support of the amendment application. Specifically page 1 of the Safety Assessment, previously provided as Attachment II of the June 2, 1999 letter has been revised to address the proposed change to Technical Specification Section 6.8.1.a. A corrected page 6-12 to the proposed technical specification mark-up pages, previously provided as Attachment III of the June 2, 1999 letter is also provided for your information. These revisions have been determined to have no affect on the conclusion of the original Safety Assessment and Basis for No Significant Hazards Consideration Determination provided as Attachment II to our June 2, 1999 letter.

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.

Very truly yours,



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SAFETY ASSESSMENT

SECTION I – DESCRIPTION OF CHANGES

This application for amendment seeks the relocation of selected Technical Specification Administrative Controls related to Quality Assurance. These changes are being proposed in accordance with the NRC Administrative Letter 95-06: “Relocation of Technical Specification Administrative Controls Related to Quality Assurance.” This letter addresses the administrative controls associated with Reviews and Audits; Procedure Review Processes; and Records and Record Retention. The requirements of the Technical Specifications associated with these functions will be incorporated into the next revision of the Quality Assurance Program Description (QAPD).

Technical Specification Section 6.5, “Reviews and Audits,” has been revised to refer to the Quality Assurance Program Description (QAPD). The requirements of Technical Specification Sections 6.5.1 through 6.5.2.10.c have been relocated to the QAPD. The text of the list of audits was edited, in accordance with NRC Inspection Manual, Part 9900: Technical Guidance STS6528.TG “Standard Technical Specifications Section 6.5.2.8-Requirements For Off-Site Committee Audit Functions.” In accordance with this guidance, the word “All” was deleted from the text of the audit descriptions (previously TS 6.5.2.8.c and TS 6.5.2.8.d). Minor edits for clarification of Technical Specifications references were also performed. Except for these noted changes, the text of the Technical Specification was relocated in its entirety.

Minor editorial changes to TS 6.8.1.a. to clarify Technical Specification subsection references were also performed. Technical Specification Section 6.8.2 regarding administrative controls for the review and approval of procedures and procedure changes has been revised to refer to the QAPD. The requirements of Technical Specification Section 6.8.2 have been incorporated into QAPD Table B as Interpretation 19 to clarify the ANSI N18.7 procedure review and approval process. Minor edits for clarification of Technical Specifications references were also performed. Except for the noted change, the text of the Technical Specification was relocated in its entirety.

Technical Specification Section 6.8.3 regarding the administrative controls for temporary procedure changes has been revised to refer to the QAPD. The requirements of Technical Specification Section 6.8.3 have been incorporated into QAPD Table A to replace Exception 6 to ANSI N18.7 Section 5.2.2. Previously, QAPD Table A Exception 6 referred to the Technical Specifications. The new Exception 6 incorporates the text of the current Section 6.8.3 in its entirety.

Technical Specification Section 6.10 regarding record retention periods has been revised to refer to the QAPD. The requirements of Technical Specification Section 6.10 have been incorporated into the QAPD Table B as Interpretation 14.1 to clarify the ANSI N45.2.9 subsection 3.2.7, “Retention of Records,” requirements. Minor edits for clarification of Technical Specifications references were also performed. Except for the noted change, the text of the Technical Specification was relocated in its entirety.

SECTION II - EVALUATION OF CHANGES

Administrative Letter 95-06 (Reference 1) was issued by the NRC staff to provide information to licensees regarding the relocation of Technical Specification Administrative Controls related to Quality Assurance from the Technical Specifications to the Quality Assurance Program Description (QAPD). In this letter, the requirements related to Reviews and Audits; Procedure Review Processes; and Records and Record Retention were specifically targeted for relocation.

Section 6.5 of the current Indian Point 2 Technical Specifications contain the requirements for Review and Audit functions of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facility Safety Committee (NFSC). In accordance with the guidance found in Reference 1, this application relocates these requirements from the Technical Specification and to the QAPD as an Appendix. Section 6.5 of the Technical Specifications still contains the requirements to perform reviews and audits. However, the section now states that the specific requirements for these functions are found in the QAPD. This relocation does not change any of the requirements associated with the review and audit function. It does not alter the performance or frequency of these activities. Any future changes to the QA Program Description, which might constitute a reduction in commitments, shall be governed by 10 CFR 50.54(a).

The list of audits to be performed, under the cognizance of the NFSC by Quality Assurance, are listed in the QAPD Section 4.1 Audit Program. This section was edited to delete this list and now references the QAPD Appendix B. Appendix B contains the current text of Technical Specification Section 6.5 "Reviews and Audits". The QAPD Section 4.1 discussion of audit report distribution was edited to reflect the descriptive phrases currently contained in Technical Specification Section 6.5.2.10.c.

The list of audits to be performed under the cognizance of the NFSC, by Quality Assurance, are listed in the QAPD Appendix B. The list from the present Technical Specification was edited. The word "all" was deleted from the requirement to audit "actions taken to correct deficiencies" in accordance with the NRC Inspection Manual, Part 9900: Technical Guidance STS6528.TG "Standard Technical Specifications Section 6.5.2.8-Requirements For Off-Site Committee Audit Functions"(Reference 2). This guidance presents the clarification that it is acceptable for licensees to use sampling methods for those plant specific Technical Specification requirements that either do or do not contain the word "all" for the audit function. The word "all" was also deleted from the requirement to audit "activities required by the Quality Assurance Program".

Section 6.8.2 of the current Indian Point 2 Technical Specification contains requirements for the review and approval of procedures and procedural changes. In accordance with the guidance contained in Reference 1, this application relocates these requirements from the Technical Specifications to the QAPD Table B, "Interpretation/Alternates". The present text of the Technical Specification 6.8.2 has been incorporated into the QAPD Table B, as Interpretation 19, to clarify the ANSI N18.7 procedure review and approval process. This relocation does not change any of the requirements associated with the procedure review and approval process. Any future changes to the QA Program Description, which might constitute a reduction in commitments, shall be governed by 10 CFR 50.54(a).

Section 6.8.3 of the current Indian Point 2 Technical Specification contains requirements for Temporary Procedure Changes. In accordance with the guidance contained in Reference 1, this application relocates these requirements from the Technical Specifications to the QAPD Table A, "Interpretation/ Alternates /Exceptions". The current text of Technical Specification 6.8.3 has been incorporated into the QAPD Table A, as Interpretation 6, to clarify the ANSI N18.7 temporary procedure change (TPC) review and approval process. The previous Interpretation 6 referred to the technical specification. This interpretation has been revised to state the requirement. This relocation does not change any of the responsibilities associated with the TPC review and approval process. Any future changes to the QA Program Description, which might constitute a reduction in commitments, shall be governed by 10 CFR 50.54(a).

Section 6.10, "Record Retention" of the current Indian Point 2 Technical Specification contain the requirements for the retention of records. In accordance with the guidance contained in Reference 1, this application relocates these requirements from the Technical Specifications to the QAPD. Sections 6.10 of the Technical Specifications still contain the requirement to retain records. However, this section now states that the requirement to retain specific record types and the minimum retention periods for those records are contained in the QAPD. QAPD Table B, "Interpretations/Alternates" was modified. An interpretation to Regulatory Guide 1.88, Revision 2, endorsing ANSI N45.2.9-1974, "Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records," Section 3.2.7, "Retention Of Records", was added. Section 3.2.7 states, "Type of quality assurance records with minimum retention periods are listed in Appendix A of this standard." Technical Specification Section 6.10 generally reflects N45.2.9 Appendix A.6 "Operational Phase Activities". The text of Section 6.10, with minor editing of Technical Specification references, was relocated to the QAPD as item B14.1, as the interpretation of the types of records to be retained and the associated retention period.

The QAPD has been revised, with no reduction of commitment, in accordance with 10 CFR 50.54a, to reflect these clarifications. Copies of the change pages have been included in Attachment IV. The QAPD will be submitted to the NRC in accordance with its normal twenty-four (24) month updated cycle in December of 1999.

SECTION III- NO SIGNIFICANT HAZARDS EVALUATION

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

- 1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously analyzed?

Response:

This amendment application does not involve a significant increase in the probability or consequences of an accident previously analyzed. The relocation of the administrative controls from the Technical Specification to the Quality Assurance Program Description (QAPD) does not alter the performance or frequency of these activities. Any future changes to the QA Program Description, which might constitute a reduction in commitments, are governed by 10 CFR 50.54(a). Therefore, sufficient controls for these requirements exist and these changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

- 2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

This amendment application does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes involve the relocation of requirements from the Technical Specifications to the QAPD. Relocation of these requirements does not affect plant equipment or the way the plant operates. The functions continue to be performed in the identical manner as they are currently being performed. Therefore, the proposed revisions can not create a new or different kind of accident.

- 3) Does the proposed license amendment involve a significant reduction in a margin of safety?

Response:

This amendment application does not involve a significant reduction in a margin of safety. The requested Technical Specification revisions relocate the administrative control requirements from the Technical Specifications to the QAPD. These requirements are not being altered by this relocation. The functions continue to be performed in the identical manner as they are currently being performed. Any future changes to the QA Program Description, which might constitute a reduction in commitments, are governed by 10 CFR 50.54(a). Therefore, sufficient controls for these requirements exist and these changes do not involve a significant reduction in a margin of safety.

SECTION IV-IMPACT OF CHANGES

The administrative control requirements continue to be performed in the identical manner as they are currently being performed. The extent of the impact of these changes will be to revise the references to these requirements in the station procedures that implement these requirements. UFSAR Section 12.4, "Records" contain a reference to "the requirements of the Technical Specifications", which will be revised to reference the QAPD upon issuance of the subject amendment. UFSAR Section 12.5, "Review and Audit of Operations" contains two references to "the requirements of the Technical Specifications" which will be revised to reference the QAPD upon issuance of the subject amendment. These changes will not adversely affect any of the plant license commitments. Any subsequent changes to these requirements will be controlled in accordance 10 CFR 50.54 (a).

SECTION V-CONCLUSIONS:

Based upon the above discussion, the incorporation of these changes will not involve any significant hazards considerations as defined in 10 CFR 50.92. These changes will not involve an increase in the probability or consequences of an accident previously evaluated; will not create the possibility of a new or different kind of accident from any accident previously evaluated; and will not involve a significant reduction in a margin of safety. These changes are consistent with the NRC observations delineated in the NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance".

SECTION V-REFERENCES

- 1) NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance"
- 2) NRC Inspection Manual, Part 9900: Technical Guidance STS6528.TG "Standard Technical Specifications Section 6.5.2.8-Requirements For Off-Site Committee Audit Functions"
- 3) Regulatory Guide 1.33, revision 2, endorsed ANSI N18.7-1976, Quality Assurance Program Requirements(Operations)
- 4) Regulatory Guide 1.88, revision 2, endorsed ANSI N45.2.9-1974, "Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records"