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September 29, 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

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

Transmitted herewith is page I-1 of Attachment I, Sensitive Leak Rate Test-Type "B" Safety Assessment. Due to a clerical error, this page was inadvertently omitted from the March 26, 1999 submittal on our application for an amendment to the Indian Point 2 (IP2) Facility Operating License DPR-26 and Technical Specifications to allow a one-time extension of Technical Specification surveillance intervals.

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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A001

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

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SURVEILLANCE NUMBER: PT-R11 Sensitive Leak Rate Test – Type "B"

The applicable Technical Specification section is: 4.4.B

The present RRD (final date) for this item is: December 22,1999

The number of months needed to extend to reach JUNE 3, 2000: Six

SECTION I - DESCRIPTION OF CHANGE

This application for amendment to the Indian Point 2 (IP2) Technical Specifications proposes to revise Section 4.4.B to allow a one-time extension of the surveillance interval for the functional test of the Sensitive Leak Rate Test – Type "B" due in December, 1999. If approved this surveillance will be completed during the next refueling outage, which will commence no later than June 3, 2000. Based on the above dates, the maximum length of the extension would be six months. Without this one-time extension, an outage will be necessary to perform the required surveillance.

Technical Specification 4.4.B requires that a sensitive leakage rate test be conducted such that containment penetrations, weld channels, and certain double-gasketed seals and isolation valve interspaces are pressurized to a minimum of 52 psig. The containment is maintained at atmospheric pressure during the test. The test is successful if the total leakage is less than or equal to 0.2% of the containment free volume per day (15.2 SCFM).

SECTION II – EVALUATION OF CHANGE

According to UFSAR 5.1.11.3, this test is termed "sensitive" because it is considered more sensitive to specific leakage paths than the Type A Integrated Leak Rate Test of the containment structure. This is because the penetrations and seals are supplied with pressurization air through the Weld Channel Pressurization (WCP) System in a number of parallel zones which are instrumented and can be individually isolated to diagnose suspected leakage. These zones are monitored online to ensure proper system operation and maintenance of the system.

No credit is taken for the operation of the WCP System in the calculation of offsite accident doses. However, the WCP System functions to limit the fission product release from containment. This provides assurance that the containment leak rate is lower than that assumed in the accident analysis. The WCP is normally inservice when above cold shutdown and is relied upon to fail in the pressurized mode.

The Sensitive Leak Rate Test is performed by pressurizing system headers which provide service to multiple sets of containment isolation valves and containment penetrations.