

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Enclosure 1 <u>SAFETY EVALUATION REPORT</u> <u>TECHNICAL SPECIFICATION AMENDMENT TO REVISE BASES</u> <u>FOR TECHNICAL SPECIFICATIONS 2.3 AND 3.5</u> <u>CONSOLIDATED EDISON COMPANY OF NEW YORK</u> <u>INDIAN POINT STATION, UNIT 2</u> <u>DOCKET NO. 50-247</u>

1.0 INTRODUCTION

By letter dated March 31, 1993 and April 26, 1994, the Consolidated Edison Company of New York (the licensee) requested an amendment to Facility Operating License No. DPR-26 to revise the Bases for Technical Specifications (TS) 2.3, "Limiting Safety System Settings, Protective Instrumentation," and TS 3.5, "Instrumentation Systems," for Indian Point Station, Unit 2. The proposed changes revise the Bases to reflect that plant trip setpoints specified in TS 2.3 and 3.5 are nominal values at which bistables are set and that "as left" settings are subject to calibration accuracy. Administrative limits have also been determined to accommodate instrument drift and the accuracy to which setpoints can be measured and calibrated.

2.0 EVALUATION

The limiting safety system settings as described in TS 2.3 apply to reactor trip settings for instrument channels monitoring reactor power and reactor coolant pressure, temperature, flow and pressurizer level. The plant instrumentation systems as described in TS 3.5 provide for automatic initiation of Engineered Safety Features in the event that process variable limits are exceeded. The proposed revision to the Bases for TS 2.3 and 3.5 would acknowledge that the reactor trip setpoints and Engineered Safety Features Actuation System instrumentation trip setpoints, respectively, are nominal values at which the bistables may be set for each functional unit and that "as left" settings are subject to calibration accuracy measurement. Trip setpoints for process rack modules and calibration points for sensors/transmitters are considered to be adjusted consistent with the nominal value when the "as left" value is within the allowed band for calibration accuracy. This band is defined by the calibration accuracy applied in both the conservative and non-conservative directions about the trip setpoint for process rack modules and the calibration point(s) for sensors/transmitters as defined by plant calibration procedures and used in the plant setpoint study.

The licensee has stated that trip setpoints are derived by combining all channel uncertainties using the square root of the sum of the squares methodology as described in the IP2 setpoint study. Administrative limits for these trip setpoints have been determined to account for instrument drift and the accuracy to which setpoints can be measured and calibrated. The

- 2 -

administrative limit for IP2 serves the same function as the allowable value defined in the Standard Technical Specifications and plant setpoint methodology. The revised Bases states that operation with "as found" setpoints less conservative than the administrative limit requires that further instrument operability evaluations be performed. Process rack modules or sensors/transmitters found outside the "as left" band for calibration accuracy must be returned to the setpoint (within as-left band) during the performance of each calibration. Operation with "as found" setpoints less conservative than the trip setpoints but found within the administrative limit is considered acceptable because an allowance has been made in the setpoint calculations to accommodate these errors. The licensee has also stated that periodic surveillance tests and procedures will continue to verify that instrument performance is bounded by the plant setpoint study.

Based on the information provided by the licensee, the staff finds the proposed changes to the Bases for TS 2.3 and 3.5 acceptable.

3.0 CONCLUSION

The licensee has requested to revise the Bases for TS 2.3 and 3.5 to reflect the use of nominal reactor trip setpoints and Engineered Safety Features Actuation System setpoints that are subject to calibration accuracy. The proposed changes do not invalidate the assumptions in the plant licensing basis. In addition, periodic surveillance requirements ensure the overall

- 3 -

operability of these systems. The licensee setpoint study provides margin between the administrative limit and the trip setpoint to account for instrument drift and the accuracies to which setpoints can be measured and calibrated for the maximum surveillance interval allowed by the TS. Therefore, the staff finds the proposed changes to be acceptable.

- 4 -

Enclosure 2

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

FACILITY NAME: Indian Point, Unit 2

SUMMARY OF REVIEW/INSPECTION ACTIVITIES

The licensee submitted a request to change the Bases for Technical Specifications 2.3, "Limiting Safety System Settings, Protective Instrumentation," and TS 3.5, "Instrumentation Systems." Specifically, the proposed revision would acknowledge that the reactor trip setpoints and Engineered Safety Features Actuation System instrumentation trip setpoints, respectively, are nominal values at which the bistables may be set for each functional unit and that "as left" settings are subject to calibration accuracy measurement. The staff has concluded that the proposed changes are acceptable.

NARRATIVE DISCUSSION OF LICENSEE PERFORMANCE/FUNCTIONAL AREA

The licensee's submittal required further clarification concerning allowable values/administrative limits, as applied to the licensees TS and surveillance program.

Principal Contributor: John Ganiere/C. Doutt, HICB/DRCH 504-2847