ATTACHMENT A

PROPOSED TECHNICAL SPECIFICATION CHANGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
AUGUST, 1994

Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels

	Channel Description	Check	Calibrate	Test	Remarks
	d. Trip of Main Feedwater Pumps	N.A.	N.A.	R	
31.	Reactor Coolant System Subcooling Margin Monitor	M	R	N.A.	
32.	PORV Position Indicator (Limit Switch)	M	R#	R#	
33.	PORV Block Valve Position Indicator (Limit Switch)	M*	R#	R#	
34.	Safety Valve Position Indicator (Acoustic Monitor)	M	R#	R#	
35.	Auxiliary Feedwater Flow Rate	M	R#	R#	
36.	PORV Actuation/ Reclosure Setpoints	N.A.	R#	N.A.	
37.	Overpressure Protection System (OPS)	N.A.	R#	**	

* Except when block valve operator is deenergized.

** Within 31 days prior to entering a condition in which OPS is required to be operable and at monthly intervals thereafter when OPS is required to be operable.

E. CONTROL ROOM AIR FILTRATION SYSTEM

The control room air filtration system specified in Specification 3.3.H shall be demonstrated to be operable:

1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes.

2. At least once every Refueling Interval(#) or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) at any time painting, fire or chemical releases could alter filter integrity by:

   a. verifying a system flow rate, at ambient conditions, of 1840 cfm ±10% during system operation when tested in accordance with ANSI N510-1975.

   b. verifying that, with the system operating at ambient conditions and at a flow rate of 1840 CFM ±10% and exhausting through the HEPA filters and charcoal adsorbers, the total bypass flow of the system to the facility vent, including leakage through the system diverting valves, is less than or equal to 1% when the system is tested by admitting cold DOP at the system intake.

   c. verifying that the system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, at ambient conditions and at a flow rate of 1840 cfm ±10%.

d. verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

3. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1973, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

4. At least once every Refueling Interval(#) by:

a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 1840 cfm ±10%.

b. verifying that, on a Safety Injection Test Signal or a high radiation signal in the control room, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.

c. verifying that the system maintains the control room at a neutral or positive pressure relative to the outside atmosphere during system operation.

5. After each complete or partial replacement of an HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 1840 cfm ±10%.

6. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 20,000 cfm ±10%.

G. POST-ACCIDENT CONTAINMENT VENTING SYSTEM

The post-accident containment venting system shall be demonstrated operable:

1. At least once every Refueling Interval(#), or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) at any time painting, fire or chemical releases could alter filter integrity by:

   a. verifying no flow blockage by passing flow through the filter system.

   b. verifying that the system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, at ambient conditions and at a flow rate of 200 cfm ±10%.

   c. at Refueling Intervals(#), verify within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

2. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

3. At least once every Refueling Interval(#) by:

   a. verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches water gauge while operating the system at ambient conditions and at a flow rate of 200 cfm ±10%.

   b. verifying that the system valves can be manually opened.

4. After each complete or partial replacement of a HEPA filter bank, by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 200 cfm ±10%.

5. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at ambient conditions and at a flow rate of 200 cfm ±10%.

Basis

The Safety Injection System and the Containment Spray System are principal plant safeguards that are normally inoperative during reactor operation. Complete systems tests cannot be performed when the reactor is operating because a safety injection signal causes reactor trip, main feedwater isolation and containment isolation, and a Containment Spray System test requires the system to be temporarily disabled. The method of assuring operability of these systems is, therefore, to combine systems tests to be performed during plant refueling shutdowns, with more frequent component tests, which can be performed during reactor operation.

Table 4.1-2

Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements

Instrument	Channel Check	Source Check	Channel Calibration	Channel Functional Test
1. GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE				
a. Liquid Radwaste Effluent Line	D*	P	R(3)#	Q(1)
b. Steam Generator Blowdown Effluent Line	D*	M	R(3)#	Q(1)
2. GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE				
a. Service Water System Effluent Line	D*	M	R(3)#	Q(2)
b. Unit 1 Secondary Boiler Blowdown Effluent Line	D*	M	R(3)#	Q(2)
3. FLOW RATE MEASUREMENTS DEVICES				
a. Liquid Radwaste Effluent Line	D(4)	N.A.	R#	Q
b. Steam Generator Blowdown Effluent Line	D(4)	N.A.	R#	Q
4. TANK LEVEL INDICATING DEVICES***				
a. 13 Waste Distillate Storage Tank	D**	N.A.	R#	Q
b. 14 Waste Distillate Storage Tank	D**	N.A.	R#	Q
c. Primary Water Storage Tank	D**	N.A.	R#	Q
d. Refueling Water Storage Tank	D**	N.A.	Q	Q

* During releases via this pathway

** During liquid additions to the tank

*** Tanks included in this specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflow and surrounding area drains connected to the liquid radwaste treatment system.

Table 4.[illegible]4

Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements

Instrument	Channel Check	Source Check	Channel Calibration	Channel Functional Test	Modes In Which Surveillance Required
1. WASTE GAS HOLDUP SYSTEM					
a. Noble Gas Activity Providing Alarm	D	M	R(3)#	Q(2)	*
2. WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM					
a. Hydrogen Monitor	D	N.A.	Q(4)	M	**
b. Hydrogen or Oxygen Monitor	D	N.A.	Q(5)	M	**
3. CONDENSER EVACUATION SYSTEM					
a. Noble Gas Activity	D	M	R(3)	Q(2)	*
4. PLANT VENT					
a. Noble Gas Activity Monitor	D	M	R(3)	Q(2)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D	N.A.	R#	N.A.	*
e. Sampler Flow Rate Monitor	D	N.A.	R	N.A.	*
5. STACK VENT					
a. Noble Gas Activity Monitor	D	P	R(3)#	Q(1)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D	N.A.	R#	N.A.	*
e. Sampler Flow Rate Monitor	D	N.A.	R	N.A.	*

* Surveillance is required at all times except when monitor has been removed from service in accordance with Table 3.9-2.

** During waste gas holdup system operation (treatment for primary system off-gasses).

h. System Functional Test R#

Verification of proper automatic actuation of this system throughout its operating sequence.

i. Main Fire Pump Capacity and System Flow Checks R#

The motor-driven pumps shall be verified to have a capacity of at least 1500 gpm each at a net pressure of ≥ 93 psig. The diesel-driven pump shall be verified to have a capacity of at least 2500 gpm with a discharge pressure of ≥ 109 psig.

j. Diesel Engine Inspection R#

Subject the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service.

k. Diesel Engine Functional Test R#

Verification that the diesel starts on the auto-start signal and operates for at least 30 minutes while loaded with the fire pump.

(ii) Valves not testable with plant on-line. R#

b. System Functional Test R#
Includes simulated automatic actuation of spray system and verification that automatic valves in the flow path actuate to their correct position.

c. Spray Header Visual Inspection R#
To verify integrity.

d. Visual Inspection of Each Spray Nozzle R#
To verify no blockage.

e. Air Flow Test once/3 years
Perform air flow test through each spray header and verify each spray nozzle is unobstructed.

2. The requirements of Specification 4.14.B.1 shall not apply to self-actuated type spray nozzles which are capable of only one actuation and cannot be periodically cycled or tested. These self-actuated spray nozzles shall be visually inspected at least once per Refueling Interval (#) to verify that no nozzle damage exists and that the nozzles are unobstructed.

C. PENETRATION FIRE BARRIER INSPECTIONS

1. The penetration fire barriers listed in Specification 3.13.C.1 shall be verified to be functional by visual inspection:

a. At least once per Refueling Interval(#).

b. Prior to declaring a fire penetration barrier functional following repairs or maintenance.

D. FIRE DETECTION SYSTEMS TESTING

1. The operability of the fire detection instruments utilized in satisfying the requirements of Specification 3.13.D.1, including the actuation of appropriate alarms (Channel Functional Test), shall be verified as follows:

Item	Frequency
a. Smoke Detectors	
(i) Those testable during plant operation (i.e., all except items 11 and 22 in Table 3.13-1).	once/6 months
(ii) Those not testable during plant operation (item 11 and 22 in Table 3.13-1)	R# R#
b. Heat Detectors	
(i) Those associated with the Diesel Generator Building (item 7 in Table 3.13-1)	once/6 months
(ii) Those associated with the Electrical Tunnel (item 4 in Table 3.13-1).	once/12 months

5. For the RCS/RHR pressure isolation valves, periodic leakage testing* shall be accomplished every time the plant is placed in the cold shutdown condition for refueling, each time the plant is placed in a cold shutdown condition for at least 72 consecutive hours if testing has not been accomplished in the preceding 9 months, and prior to returning the valve to service after maintenance, repair or replacement work is performed.

B. A test shall be performed, whenever the RCS pressure decreases to 700 psig (i.e. within 100 psig of the RHR design pressure) or whenever the RHR is secured to go to hot shutdown, to check for leakage through SIS low head injection line check valves 897A-D and RHR check valves 838A-D.

C. The containment sump pumps required to be operable by Specification 3.1.F.1.a(1) shall be demonstrated to be operable by performance of the following surveillance program:

1. At monthly intervals, each sump pump shall be started and a discharge flow of at least 25 gpm verified.

2. At Refueling Intervals(#), each sump pump shall be operated under visual observation to verify that the pumps start and stop at the appropriate setpoints and that the discharge flow is at least 25 gpm per pump.

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* To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria. Minimum test differential pressure shall not be less than 150 psid.

ATTACHMENT B

SAFETY ASSESSMENTS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
AUGUST, 1994

SAFETY ASSESSMENT

CHARGING FLOW INSTRUMENTATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification requires that a channel calibration for Charging Flow instrumentation be performed every refueling outage (Table 4.1-1, item 12). Currently, this calibration is performed every 18 months (25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Charging Flow System was reviewed using the Westinghouse methodology for evaluating channel uncertainties. Each uncertainty term was determined according to the instrument characteristics/specifications. Particular effort was made to predict a drift for the instrumentation over a 30 month period based on a statistical evaluation of plant recorded "As Left/As Found" data taken at the site since 1986. Past cycle calibration data was evaluated to determine how well the instruments had performed from one cycle to the next. This evaluation included a review of any work order data that may have been taken during a midcycle outage etc., or any modifications to the channels. Also, past M&TE accuracies were reviewed to insure that the M&TE used was of an equivalent accuracy such that it would not have biased the data in a non-conservative direction. In addition to drift, a Primary Element Accuracy term addressing the accuracy of the orifice plate to ensure a good beta ratio along with sensor, rack and M&TE terms have been incorporated into the total channel uncertainty calculations.

"As Left/As Found" data from the 1986 outage to the present were reviewed for the drift evaluations. This data has been evaluated for determination of population normality and outliers. Where possible, outliers have been eliminated by use of accepted statistical tests or mechanistic causes were determined to justify elimination. The drift values utilized in the uncertainty analysis have been determined with a 95% probability at a 75% confidence level.

There are no Technical Specification limits nor safety analysis limits which prohibit a 30 month surveillance cycle based upon the uncertainty thus determined.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. A significant increase in the probability or consequences of an accident previously evaluated will not occur.

   It is proposed that the channel calibration frequency for the Charging Flow instrumentation be changed from 18 months (+25%) to every 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any accident previously evaluated has not been created.

   The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds the current margin. Plant equipment will provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. A significant reduction in a margin of safety is not involved.

   The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds current margin. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.

SAFETY ASSESSMENT

CONTAINMENT SUMP, RECIRCULATION SUMP AND REACTOR CAVITY CONTINUOUS LEVEL INSTRUMENT CHANNELS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification Table 4.1-1, item 21b, states the surveillance requirements for the Containment Sump, Recirculation Sump and Reactor Cavity Sump continuous level monitoring instrument channels. Currently, the instrument channels are calibrated and tested every 18 months (+25%). It is proposed that this surveillance frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Sump Level channels were reviewed using the Westinghouse methodology for evaluating channel uncertainties. Each uncertainty term was determined according to the instrument characteristics/ specifications, and with specific calculations for process effects. Particular effort was made to predict a drift for the instrumentation over a 30 month period based on a statistical evaluation of plant recorded "As Left / As Found" data taken at the site from 1986 to the present. Past cycle calibration data was evaluated to determine how well the instruments had performed from one calibration to the next. This evaluation included a review of any work order data that may have been taken during a midcycle outage etc, or any modifications to the channels. Also, past M&TE accuracies were reviewed to insure that the M&TE used was of an equivalent accuracy such that it would not have biased the data in a non-conservative direction.

There are no Technical Specification limits nor safety analysis limits which prohibit a 30 month surveillance cycle based upon the uncertainty thus determined.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the calibration and test frequency for the Containment Sump, Recirculation Sump and Reactor Cavity continuous level monitoring instrument channels be revised from every 18 months (+25%) to 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds current margin. Plant equipment will provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. There has been no reduction in the margin of safety.

   The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds current margin. This margin is necessary to assure that protective safety functions will occur so that safety analysis limits are not exceeded.

SAFETY ASSESSMENT

AUXILIARY FEEDWATER FLOW RATE CHANNEL

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification governing the Auxiliary Feedwater Flow Rate, Table 4.1-1, item #35, requires a channel calibration/test be performed at every refueling outage. Currently, this surveillance is performed every 18 months (+25%). It is proposed that this surveillance frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

All completed test procedures from the 1987 outage to the present were reviewed. This included any midcycle outage calibrations that may have resulted due to channel failures or modifications and the impact of Measurement and Test Equipment (M&TE) used to record the data. The "As Left/As Found" data from the completed test procedures was statistically evaluated to determine a projected 30 month drift value with a 95% probability at a 75% confidence level. This drift value was used as an input to determine the Channel Statistical Allowance (CSA) using the Westinghouse setpoint methodology. Included in the evaluation along with instrument drift is the determination of all other channel uncertainties including Sensor, Rack, M&TE, and Process Effects for normal environmental conditions. In addition to drift, a Primary Element Accuracy term addressing the accuracy of the flow nozzle along with sensor, rack and M&TE terms have been incorporated into the total uncertainty calculations.

There are no Technical Specification limits nor Safety Analysis limits which prohibit a 30 month surveillance cycle based upon the uncertainty thus determined.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the calibration frequency for the Auxiliary Feedwater Flow Rate channel be revised from 18 months (+25%) to 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed based upon historical test data. Based on this analysis a change to the Technical Specifications is required. Sufficient margin exists between the Safety Analysis limit and proposed Technical Specification limit to accommodate projected channel uncertainty over a 30 month operating cycle. A statistical basis exists to assure that protective action will occur to prevent Safety Analysis limits from being exceeded. Thus, there will not be a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

Based upon a statistical analysis of past historical test data it has been demonstrated that reasonable assurance exists to conclude that Safety Analysis limits will not be exceeded over a 30 month operating cycle. The proposed Technical Specification limits provide margin with respect to the Safety Analysis limits and confidence that appropriate plant protective response will be provided to prevent the possibility of a new or different kind of accident from that previously evaluated from being created.

3. There has been no reduction in the margin of safety.

The proposed changes to the Technical Specification limits are being made to assure that the previously established margin remains the same between plant protective function set points and Safety Analysis limits. This margin is based upon an evaluation of past historical test data and analytical methods for projecting instrument channel uncertainty over a 30 months operating cycle. It is therefore concluded that the existing margin of safety has been preserved.

SAFETY ASSESSMENT

CONTROL ROOM AIR FILTRATION SYSTEM

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.5.E.2 requires the Control Room air filtration system to be tested at least once every refueling interval. Specifically,

1. A system flow rate must be verified.

2. Bypass flow must be below a maximum value.

3. Compliance with sections of Regulatory Guide 1.52, Revision 2 must be demonstrated.

In addition, on a refueling interval, Technical Specification 4.5.E.4 requires:

1. Verification of pressure drop across HEPA filters and charcoal absorber banks.

2. Verification of recirculation mode of operation upon a Safety Injection or high radiation signal.

3. Verification of the ΔP between the Control Room and the ambient atmosphere.

4. Verification that the carbon adsorber bank complies with specific sections of Regulatory Guide 1.52 Rev. 2.

Currently, the Control Room Air Filtration system is surveilled every 18 months (+25%). It is proposed that this surveillance frequency be revised to every 24 months (+25%). This change is being proposed in accordance with guidance contained in Generic Letter 91-04.

The control room filtration system is designed to filter intake air and /or recirculated air when the control room is operated in the emergency mode. The control room air filtration system automatically starts upon control room isolation. High-efficiency particulate air (HEPA)filters are installed upstream of charcoal absorbers. The HEPA filters prevent clogging of the charcoal absorbers. The charcoal absorbers are installed to reduce the concentration of radioiodine in the control room atmosphere, thus reducing the intake of radioiodine by control room personnel.

Separate testing is performed to measure air flow characteristics and charcoal absorbency efficiency.

Data from seven completed flow tests were reviewed covering all tests performed since June 30, 1986. In only one test were the results found to be unsatisfactory. This was a test performed in 1987 where inadequate flow was developed due to a loose fan belt. The root cause was determined to be an improperly sized fan belt and was not time dependent. This incident would have occurred regardless of the time period between surveillances.

Data from six charcoal absorbance tests conducted from 1986 through 1993 were reviewed. Problems were initially encountered during tests conducted in 1986 and 1987. Corrective action was taken and successful tests were conducted from 1987 through 1993 indicating that the corrective action was effective and that the earlier problem was not being repeated.

In 1993, a major modification of the control room filtration system was made. The existing carbon/HEPA filter unit, which only contained a 1" thick carbon bed, was removed. Two 2" thick carbon absorber beds, placed in series, were installed which provide the equivalent of a 4" thick carbon adsorber. In addition, two new carbon filter fans were added.

Except for minor deficiencies, the carbon/filter unit which was replaced satisfies the criterion for extending the surveillance interval to 24 months (+25%). The new carbon filter unit provides increased efficiency and its performance will surpass that of the replaced unit.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the surveillance frequency for the Control Room Air Filtration System be changed from every 18 months (+25%) to every 24 months (+25%).

   For the flow tests, data from 1986 to date indicates that the Control Room Filtration System performed in an acceptable manner when surveilled on an 18 month (+25%) basis. The only discrepancy was due to a hardware error and was independent of the time between surveillances. Per Generic Letter 91-04, this past test history provides an adequate basis to conclude that an extended operating cycle would have minimal impact upon the flow characteristics of the Control Room Filtration System. The modification of the filtration system in 1993 only enhanced system performance.

   With regard to the absorbance properties of the charcoal, previous test data highlights a problem occuring during the 1986-1987 period which subsequent testing confirms was adequately resolved.

   With the 1993 modification which increased the carbon bed thickness from 1" to 4", performance can only be enhanced.

   Therefore, it is concluded that a significant increase in the probability or consequences of an accident previously evaluated will not be incurred by changing the surveillance interval from 18 months (+25%) to 24 months (+25%).

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

A review of past historical surveillance data over 7 years indicates no failures which were time dependent. The modification, which was performed in 1993, can only enhance performance of the system. New fans, an increased charcoal bed thickness, and new HEPA filters will increase the reliability of the system. Thus, it is concluded that the possibility of a new or different kind of accident than that previously evaluated has not been created.

3. There has been no significant reduction in the margin of safety.

Past test data validated the acceptability of the previous air filtration system for an extended surveillance interval. The modification performed in 1993 will only enhance the reliability and performance of the air filtration system. Thus, it is concluded that a significant reduction in the margin of safety is not involved.

SAFETY ASSESSMENT

POST ACCIDENT CONTAINMENT VENTING SYSTEM

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.5.G delineates the surveillance requirements for the Post Accident Containment Venting System. Currently, the post Accident Containment Venting System is surveilled every 18 months (+25%). It is proposed that this surveillance frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Post Accident Containment Venting system consists of a common penetration line that acts as a supply line through which hydrogen-free air can be admitted to the containment, and an exhaust line, with parallel valving and piping, through which hydrogen-bearing gases from containment may be vented through a filter.

The supply modes use instrument air to feed containment. In the exhaust mode, the line penetrates the containment and then is divided into parallel lines. Each parallel line contains a pressure sensor and all the valves necessary for controlling the venting operation. The two lines then rejoin and the exhaust passes through charcoal and HEPA filters. The exhaust is then directed to the plant vent.

Five completed test procedures from 1993 to 1986 were reviewed. In two separate instances in 1987 and 1989, descrepant conditions were noted. In 1987, technicians damaged the filter during test preparations by inducing a puncture precluding the obtainment of "as found" data. This condition is independent of the time period between surveillances. In 1989, a HEPA gasket was found damaged. After replacement of the gasket, subsequent surveillances in 1991 and 1993 did not result in a recurrence of the problem. Therefore, the 1989 incident is considered to be a one time only event, not related to time, and unlikely to reoccur due to an extension of the surveillance interval from 18 months (+25%) to 24 months (+25%).

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the surveillance frequency for the Post Accident Containment Venting system be revised from every 18 months (+25%) to 24 months (+25%).

   A review of past test history from 1986 to date indicates that the Post Accident Containment Venting System performed in a satisfactory manner when the surveillance period was 18 months (+25%). There was one discrepant condition noted in the 1989 test, which, based upon subsequent tests in 1991 and 1993, does not appear to have been age related. The 1989 observation concerning a gasket is considered to be a one time only event and unlikely to reoccur as a result of extending the surveillance interval from 18 months (+25%) to 24 (+25%).

An added consideration, in terms of safety significance, is the fact that the Post Accident Containment Venting system is diverse and redundant to the post accident hydrogen recombiners which are themselves redundant and the primary means of reducing the post accident hydrogen concentration within containment. The venting system is not relied upon for containment pressure control.

Due to the satisfactory past test history of the venting system, together with its secondary role as a means of controlling post accident hydrogen concentration, it is concluded that a significant increase in the probability or consequences of an accident previously evaluated will not be incurred by changing the surveillance interval from 18 months (+25%) to 24 months (+25%).

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

A review of past historical surveillance data over 7 years indicates no failures which are considered to be time dependent. Although one discrepant condition was observed in the 1989 test it was not repeated in subsequent surveillances. Per Generic Letter 91-04, this constitutes a sufficient basis for revising the surveillance interval from 18 months (+25%) to 24 months (+25%). This extension in the operating interval is not expected to have an impact upon the availability of the system. Thus, it is concluded that the possibility of a new or different kind of accident previously evaluated has not been created.

3. There has been no reduction in the margin of safety.

As past test data validates the presumption that an extended operating cycle will not impact the availability of the Post Accident Containment Venting Systems, it is concluded that a significant reduction in the margin of safety is not involved.

SAFETY ASSESSMENT

LIQUID RAD-WASTE FLOW CHANNEL

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specifications require that the Liquid Rad-Waste flow channel be calibrated every refueling outage (Table 4.10-2, item #3.a). Currently, this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

All completed test procedures from the 1986 outage to the present were reviewed. This includes any midcycle outage calibrations that may have resulted due to channel failures or modifications, and the impact of Measurement and Test Equipment (M&TE) used to record the data. The drift value used in this analysis is based on a review of "as left / as found" data and engineering judgement, and was incorporated into the determination of the Channel Statistical Allowance (CSA) using the Westinghouse setpoint methodology. Included in the evaluation along with instrument drift is the determination of all other channel uncertainties including Sensor, Rack and M&TE for normal environmental conditions.

Based upon the above evaluation, a 30 month drift has been projected which does not impact any Technical Specification limit or Safety Analysis Limit. Therefore, there are no adverse consequences arising from extending the surveillance interval from 18 months (+25%) to 24 months (+25%).

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the channel calibration frequency for the Liquid Rad-Waste Flow Channel be revised from every 18 months (+25%) to every 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds current margin. Plant equipment will be set to provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. There has been no reduction in the margin of safety.

The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the allowable operating margin. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.

SAFETY ASSESSMENT

STEAM GENERATOR BLOWDOWN FLOW CHANNEL

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification requires that a channel calibration of the Steam Generator Blowdown flow channel be performed every refueling outage (Table 4.10-2, item #3b). Currently, this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Steam Generator Blowdown Flow Channels were reviewed using the Westinghouse methodology for evaluating channel uncertainties. Each uncertainty term was determined according to the instrument characteristics and/or specifications. Particular effort was made to predict a drift for the instrumentation over a 30 month period based on engineering judgement of plant recorded "As Left/As Found" data taken at the site since 1988. Past cycle calibration data was evaluated to determine how well the instruments had performed from one cycle to the next. This evaluation included a review of any work order data that may have been taken during a midcycle outage, etc. or any modifications to the channels.

Based upon the above evaluation a 30 month drift has been projected which does not impact any Technical Specification limit or safety analysis limit. Therefore, there are no adverse consequences arising from extending the surveillance interval from 18 months (+25%) to 24 months (+25%).

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the channel calibration frequency for the Steam Generator Blowdown Flow channel be revised from every 18 months (+25%) to every 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds the current margin. Plant equipment will provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. There has been no reduction in the margin of safety.

   The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the allowable operating margin. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.

SAFETY ASSESSMENT

LIQUID WASTE DISTILLATE TANK LEVEL CHANNELS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specifications require that the Liquid Waste Distillate Tank Level Channels for tanks 13 and 14 be calibrated every refueling outage (Table 4.10-2, items #4a and #4b). Currently, this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

All completed test procedures from 1986 to the present, including any midcycle outage calibrations that may have resulted due to channel failures or modifications, and the impact of Measurement and Test Equipment (M&TE) used to record the data have been evaluated. The drift uncertainty used in this analysis is based on "as left/as found" data, vendor specifications and engineering judgement, and was used as input to determine the Channel Statistical Allowance (CSA) using the Westinghouse setpoint methodology. Included in the evaluation along with instrument drift is the determination of all other channel uncertainties including Sensor, Rack, M&TE, and Process Effects for normal environmental conditions. The evaluation of indication uncertainties is based on the commitment to calibrate the indicators to graduation marks on the indicators. This allows calibration accuracy to be independent of meter readability.

Based upon the above evaluation, a 30 month drift has been projected which does not impact any Technical Specification limit or safety analysis limit. Therefore, there are no adverse consequences arising from extending the surveillance interval from 18 months (+25%) to 24 months (+25%).

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the channel calibration frequency for the Liquid Waste Distillate Tank level of tanks 13 and 14 be revised from every 18 months (+25%) to every 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds current margin. Plant equipment will be set to provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. There has been no reduction in the margin of safety.

The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the allowable operating margin. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that safety analysis limits are not exceeded.

SAFETY ASSESSMENT

PRIMARY WATER STORAGE TANK
LEVEL INSTRUMENTATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification requires that the Primary Water Storage Tank Level Channel be calibrated at every refueling outage (Table 4.10-2, item 4c). Currently this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Primary Water Storage Tank has a volume of 165,000 gallons. Its primary function is the storage of demineralized water used by the primary water makeup system. The level of the water in the tank is measured and indicated locally as well as in the control room. In addition, high and low levels are alarmed in the control room.

All completed test procedures from 1986 through and including 1993 were evaluated. This evaluation included any midcycle outage calibrations that may have resulted due to channel failures or modifications, and the impact of Measurement and Test Equipment (M&TE) used to record the data have been evaluated. The drift uncertainty used in this analysis is based on "As Left/As Found" data and engineering judgement, and was used as an input to determine the Channel Statistical Allowance (CSA) using the Westinghouse Setpoint methodology. Included in the evaluation along with instrument drift is the determination of all other channel uncertainties including Sensor, Rack, M&TE, and Process Effects for normal environmental conditions. The evaluation of indication uncertainties is based on calibration of the indicators to graduation marks on the indicators. This allows calibration accuracy to be independent of meter readability.

There are no Technical Specification limits nor Safety Analysis limits which prohibit a 30 month surveillance cycle based upon the uncertainty thus determined.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the channel calibration frequency for the Primary Water Storage Tank Level instrumentation be changed from every 18 months (+25%) to 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month surveillance has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the channel statistical error resulting form a 30 month surveillance. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

The proposed change in surveillance interval will result in a channel statistical allowance which can be accommodated over a 30 month operating cycle. Plant equipment, which will be set at (or more conservatively than) Technical Specification limits, will provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. There has been no significant reduction in the margin of safety.

The above changes in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds current margin. This margin is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.

SAFETY ASSESSMENT

REFUELING WATER STORAGE TANK LEVEL

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification requires that a channel calibration for the Refueling Water Storage Tank (RWST) be performed every refueling outage (Table 4.10-2, item 4d). As a result of a statistical analysis of channel accuracy based upon a review of past test data, it is proposed that this calibration frequency be increased to once per quarter. This will formalize current and past surveillance practices at the plant.

The purpose of the RWST low level alarm is to alert the operator to check the RWST level and start to terminate the injection phase and initiate the recirculation phase of safety injection during a large break LOCA by initiating the 8 switch sequence. The alarm must be set high enough to allow sufficient time for the operator to switch over without depleting the tank to a point where the SI pumps could be damaged and to allow sufficient volume for NaOH spray into containment.

Pursuant to Technical Specification Section 3.3.A.3, 246,000 gallons is required for the injection phase, 60,000 gallons for the recirculation phase, with the rest of the tank inventory being made up of unavailable volume, margin and instrument uncertainties.

All completed test data for the last six calibrations were reviewed. The "As Left/ As Found" data from the completed test procedures was statistically evaluated to determine a projected 30 month drift value with a 95% probability at a 75% confidence level. This data has been evaluated for determination of population normality and outliers. Where possible, outliers have been eliminated by use of accepted statistical tests or where mechanistic causes were determined to justify elimination. Also, past M&TE accuracies were reviewed to insure that the M&TE used was of an equivalent accuracy such that it would not have biased the data in a non-conservative direction.

The resulting 30 month projected drift value in combination with the other channel uncertainties resulted in a Channel Statistical Allowance that was too large to support the present licensing basis over a 30 month surveillance interval. Therefore, this evaluation was completed on the basis that the present practice of instrument calibration every 3 months would continue. The current licensing basis limits channel uncertainties to 12,400 gallons which is equivalent to the most adverse drift that could occur in a period somewhat greater than 3 months. The evaluated 3 month drift was used as an input to determine the Channel Statistical Allowance (CSA) using the Westinghouse setpoint methodology. Included in the evaluation along with instrument drift was the determination of all other channel uncertainties, including Sensor, Rack, M&TE, and Process Effects for normal environmental conditions.

Basis for No Significant Hazards Consideration Determination

The proposed change does not involve a significant hazards consideration since:

1. A significant increase in the probability or consequences of an accident previously evaluated will not occur.

   It is proposed that the channel calibration frequency for the RWST instrumentation be changed from every 18 months (+25%) to quarterly (once every 3 months).

   A statistical analysis of channel uncertainty for a quarterly surveillance has been performed. Based upon this analysis it has been concluded that sufficient margin exists between the existing Technical Specification limit and the licensing basis Safety Analysis limit to accommodate the channel statistical error resulting from a quarterly surveillance. The existing margin between the Technical Specification limit and the Safety Analysis limit provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to quarterly can not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any accident previously evaluated has not been created.

   The proposed change in surveillance interval will result in a channel statistical allowance which provides the necessary margin between the existing Technical Specification limit and the Safety Analysis limit. Plant equipment, which will be set at (or more conservatively than) Technical Specification limits, will provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

3. A significant reduction in a margin of safety is not involved.

   The above change in surveillance interval will result in a channel statistical allowance which is necessary between the current Technical Specification limit and the licensing basis Safety Analysis limit. This margin is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.

SAFETY ASSESSMENT

FLOW RATE MONITORS
PLANT VENT (UNIT 2) AND STACK VENT (UNIT 1)

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point 2 Technical Specifications require that the flow rate monitors for the Plant Vent (Unit 2) and the Stack Vent (Unit 1) be calibrated at a refueling interval (Table 4.10-4, items 4.d and 5.d). Currently, this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

Potentially radioactive gases are discharged to the atmosphere through either the Plant Vent or the Stack Vent. The effluent from these vents is continuously monitored for particulate, gaseous and iodine radioactivity. In order to maintain gaseous effluents within allowed limits, both the concentration of radioactive material and the flow rate must be known. The concentration is provided by the installed instruments normally, and by grab samples when limits are approached or the installed instruments are inoperable. The flow rate is provided by installed flow rate monitors normally, and by estimating flow if an installed flow rate monitor is inoperable. There is one flow rate monitor in each of the Plant Vent and Stack Vent. These monitors are calibrated each refueling.

During plant operation, Technical Specifications require one flow rate monitor to be operable during release via the respective pathway. Should the monitor be inoperable during release, Technical Specifications require that the flow rate be estimated every four hours.

These monitors are reliable devices which have been used to measure flow for many years. Gross out of calibration conditions would be detected by the daily channel checks. These monitors do not have setpoints which are critical to plant operation or safety, and their readings are not used in calculations which require accuracy. Technical Specifications allow the use of estimated flow values in the event that the monitor is inoperable. Therefore, increasing the time interval to 30 months between calibrations would have no significant affect on safety.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the calibration frequency for the flow rate monitors for the Plant Vent (Unit 2) and the Stack Vent (Unit 1) be revised from every 18 months (+25%) to every 24 months (+25%).

A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists to accommodate the statistical error resulting from a 30 month operating cycle. The existing margin provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

The proposed change in operating cycle length due to an increased surveillance interval will not result in a statistical allowance which exceeds the current margin. Plant equipment will be calibrated to provide data to assure that safety analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from an previously evaluated from occurring.

3. There has been no reduction in the margin of safety.

The proposed change in the surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the allowable operating margin. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that safety analysis limits are not exceeded.

SAFETY ASSESSMENT

STACK VENT NOBLE GAS ACTIVITY MONITOR
(R-60)

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

The current Indian Point 2 Technical Specification requires that the Stack Vent Noble Gas Activity Monitor (R-60) be calibrated at a refueling interval (Table 4.10-4, item 5a). Currently, this calibration is performed every 18 months (+25%). It is proposed that this calibration frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

The Unit 1 stack vent is continuously sampled for iodine activity, particulate activity and radioactive gas by radiation monitor R-60. The series connected monitors in R-60 take a continuous air sample from the stack vent, measure the activity and flow rate, and return the air back to the stack vent. Since no high level radioactivity is expected to be exhausted through the stack vent, the monitor does not have any control functions. R-60 provides alarms in the Unit 2 control room when the setpoints are exceeded. This monitor is a relatively new monitor and only one completed surveillance test is available. The surveillance results were reviewed and found to be satisfactory. In addition, the Technical Specifications permit the use of this release pathway even if the monitor is inoperable, provided grab samples are taken once per 12 hours. Thus, although only limited test data is available, it is concluded that any additional uncertainty introduced by extending the operating cycle to 30 months is enveloped by the uncertainty inherent in a grab sample. In addition, the vendor recommends a calibration frequency determined on the basis of user experience. Insofar as the one calibration interval of 18 months (+25%) indicated no excessive drift, justification exists to extend the surveillance interval to 24 months (+25%).

This monitor measures the activity of potentially radioactive gaseous effluent through the stack vent. The alarm setpoints are set by the operators at a point as close as practical to the steady state values. This setpoint is always low enough to provide adequate warning before the allowed concentration is reached. The setpoint is normally several decades below the allowed instantaneous release limit.

The system monitors gross activity and is designed to generate alarms upon detection of high activity levels. Isotopic identification and concentrations are determined by grab sample analysis.

R-60 does not have setpoints which are critical to plant operation or safety, nor are the monitor readings used in calculations which require discrete accuracy. Their prime functions are to provide indication of changing radiation levels and to provide alarms in the event of high radiation levels in the stack vent. Actual setpoints for the alarms are not critical to either plant operation or calculation of released radioactive material.

These monitors are static devices with proven reliability. Gross out of calibration conditions would be detected by the daily checks or quarterly tests of R-60 or daily channel checks of the flow monitor. The setpoints are based on current backgrounds, so accuracy is far less important than functionality for these instruments, and functionality is assured by the noted checks and test.

Based on the above considerations, increasing the time interval between calibrations would have no significant affect on safety.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the calibration frequency for the stack vent noble gas activity monitor be revised from every 18 months (+25%) to every 24 months (+25%).

   The current monitor replaced the previous monitor and therefore there is only one refueling cycle surveillance data available which proved to be satisfactory. The vendor recommends a calibration period based on user experience. Insofar as the 18 month (+25%) surveillance has proven to be acceptable, extension to a 24 month (+25%) cycle is consistent with the vendor's recommendation. Any additional uncertainty generated due to the extended surveillance is bounded by the uncertainty inherent in a grab sample taken once per 24 hours which is the required compensatory action should the monitor be inoperable. Since setpoints for alarms are not critical to either plant operation or safety, since extensive margin is reflected between the setpoint and applicable limits, it is concluded that any additional uncertainty involved in a longer surveillance cycle will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   This monitor measures the activity of potentially radioactive gaseous effluent through the stack vent. The alarm setpoints are set at a point sufficiently above expected radioactivity levels to avoid unnecessary alarms and, at the same time, far below discharge limits. The purpose of the monitor is to annunciate in the event an unexpected spike in radioactivity level should occur so that corrective action can be taken prior to exceeding a discharge limit. The margin that exists between the discharge limit and the setpoint is more than sufficient to accommodate any drift that could be practically expected in a 24 month (+25%) operating cycle.

   In this capacity, the monitor does not have setpoints which are critical to plant operation or safety. Readings are not used in a quantitative manner nor is accuracy important. It is important that the instrument remain operable and respond to step changes in radioactivity level over the operating cycle. It is therefore concluded that an extended operating cycle will not result in the possibility of a new or different kind of accident from any accident previously evaluated.

3. There has been no reduction in the margin of safety.

   Sufficient margin exists between plant setpoints and applicable limits to accommodate any realistic drift projected to occur over a 30 month operating cycle. Furthermore, instrument indications are not used in a quantitative manner nor is instrument accuracy of importance. Therefore, it is concluded that no significant reduction in the margin of safety will result from an extended operating cycle.

SAFETY ASSESSMENT

HIGH PRESSURE WATER FIRE PROTECTION SYSTEM

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.14.A.1.h requires verification every refueling of proper automatic actuation of the High-Pressure Water Fire Protection system throughout its operating sequence. Currently, this surveillance is performed every 18 months (+25%). The proposed change in surveillance frequency is to every 24 months (+25%). This proposed change is being made in accordance with the guidance contained in Generic Letter 91-04.

Fire protection and detection systems are provided to protect equipment required for the safe shutdown of the unit. These systems are periodically tested and inspected in accordance with the surveillance program to assure their operability and to identify for corrective action any conditions which could prevent any portion of these systems from performing its intended function. One of these systems is the High Pressure Water Fire Protection System. This system supplies water for fire protection to main headers which in turn supply high pressure hydrants, sprinklers, hose reels, etc. An essential part of the High Pressure Water Fire Protection System is the diesel-driven fire pump and the two main motor driven fire pumps. The motor-driven pumps (main fire pumps) start automatically on low header pressure signals and provide a supply of water to the High Pressure Water Fire Protection System.

An annual main fire pump automatic start, capacity check and system flow check is performed to ensure that an operational readiness condition is maintained at all times.

All procedures from 10/10/88 through the last refueling were reviewed. This encompassed three complete tests and two partial tests. In all cases, the tests were satisfactory. No deficiencies were noted which would affect the operability of the system.

This system is a static system which is normally not required to operate. The main fire pumps are on standby and normally are not operated except for testing. The tests and inspections verify system integrity and continued operability in the unlikely event that it is needed. In addition to the tests performed every refueling, the main fire pumps are operated for at least 15 minutes on a monthly interval.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the system functional test of the High-pressure Water Fire Protection System be changed from every 18 months (+25%) to every 24 months (+25%).

   This system is a static system which is not normally required to operate. The main fire pumps are on standby and are not in operation except for testing. Thus, almost no wear is induced as a function of time except that which results from being in standby status which is minimal and slow acting. Under these circumstances, extending the operating cycle between surveillances would be expected to have negligible affect upon system operability. It is therefore concluded that there would be no significant increase in the probability or consequences of an accident as a result of an extended interval between surveillances.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   Extension of the plant operating cycle will primarily extend the time the pumps are in standby capacity. The potential for system deterioration is minimal under these circumstances. Any deterioration that does occur will be slow acting with respect to time. A significant deterioration would be detected by a monthly pump operating test. Thus, an extended operating cycle is not expected to create the possibility of a new or different kind of accident form any previously analyzed.

3. There has been no reduction in the margin of safety.

   Extension of the operating cycle by several months only serves to extend the period of time when the pumps are in standby status. Any deterioration under these circumstances will be slow acting. Significant deterioration would be detected by the monthly operating test. Therefore, it is concluded that an extended interval between surveillances will involve no significant reduction in the margin of safety.

SAFETY ASSESSMENT

FIRE PROTECTION SYSTEM DIESEL ENGINE

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.14.A.1.k specifies the frequency for the Fire Protection System Diesel Engine Functional Test. Currently, the interval between tests is every 18 months (+25%). The proposed change in test interval is to every 24 months (+25%). The proposed change is being made in accordance with the guidance contained in Generic Letter 91-04.

Fire protection and detection systems are provided to protect equipment required for the safe shutdown of the unit. These systems are periodically tested and inspected in accordance with the surveillance program to assure their operability and to identify for corrective action any conditions which could prevent any portion of these systems from performing its intended function. One of these systems is the High Pressure Water Fire Protection System. This system supplies water for fire protection to main headers which in turn supply high pressure hydrants, sprinklers, hose reels, etc. An essential part of the High Pressure Water Fire Protection System is the diesel-driven fire pump and the two main motor-driven fire pumps. The diesel pump starts automatically on a low header pressure signal or a loss of outside power and provides a supply of water to the High Pressure Water Fire Protection System.

Weekly and monthly tests are performed on the diesel-driven fire pump to ensure that it is maintained in an operational readiness condition at all times. The monthly test performs a diesel engine functional test, verifies pump capacity, and performs other tests.

Complete test reports since 1/91 were reviewed. All results were satisfactory. No deficiencies were found. Additionally, the test report data base was queried for the time period beginning 1/1/86, with only one deficiency found involving the functionality of the diesel-driven fire pump.

The High Pressure Water Fire Protection System is a static system which is normally not required to operate. The diesel fire pump is on standby and normally not operated except for testing. The tests and inspections verify system integrity and continued operability in the unlikely event that it is needed.

A monthly test is performed to meet the requirements of the Fire Protection Plan as well as the Technical Specifications. As long as the test is performed on a monthly basis, extension of the refueling interval from 18 months (+25%) to 24 months (+25%) for this test would have no affect on safety.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the Fire Protection System Diesel Engine Functional test be changed from every 18 months (+25%) to every 24 months (+25%).

Except for periodic testing, the diesel is in a standby state and not subject to operational stress. Periodic testing imposes limited wear as evidenced by the absence of major repairs during past maintenance. Extension of the operating cycle for several months is expected to have virtually no impact upon diesel operability. Monthly testing would detect any degradation. Thus it is concluded that there would be no significant increase in the probability or consequences of an accident as a result of an extended interval between surveillances.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

Extension of the plant operating cycle will, for the most part, only extend the time spent by the pumps in standby capacity. The potential for system deterioration is minimal under these circumstances. Any deterioration that does occur will be slow acting with respect to time. Significant deterioration in performance would be detected by the monthly pump operating test. Thus, an extended operating cycle is not expected to create the possibility of a new or different kind of accident from any previously analyzed.

3. There has been no reduction in the margin of safety.

Extension of the operating cycle by several months only serves to extend the period of time when the pumps are in standby status. Any deterioration under these circumstances will be slow acting and significant deterioration would be detected by the monthly operating test. Therefore, it is concluded that an extended interval between surveillances will involve no significant reduction in the margin of safety.

SAFETY ASSESSMENT

ELECTRICAL TUNNEL, DIESEL GENERATOR BUILDING, AND CONTAINMENT FAN COOLER FIRE PROTECTION SPRAY SYSTEMS

(A) SYSTEM FUNCTIONAL TEST
(B) SPRAY HEADER VISUAL INSPECTION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.14.B.1.b requires a simulated automatic actuation of the spray system and verification that automatic valves actuate for the Electrical Tunnel, Diesel Generator Building and Containment Fan Cooler Fire Protection Systems. Currently, this test is performed every 18 months (+25%). It is proposed that this test frequency be revised to every 24 months (+25%). The proposed change is being made in accordance with the guidance in Generic Letter 91-04.

As stated above, this Technical Specification provision covers more than one system. Only one system is inaccessible during normal plant operation, the Fan Cooler Fire Protection System, and the Technical Specification exists to ensure that this system is surveilled during refueling when the Fan Cooler Fire Protection System is accessible. With respect to the Electrical Tunnel and Diesel Generator Building Fire Protection Systems, which are accessible during normal plant operation, other Technical Specifications (4.14.A.1.g.(i) and 4.14.B.1.a.(i)) require that the same surveillance be performed on an annual (12 month) basis.

Technical Specification 4.14.B.1.c requires a visual inspection of spray headers every 18 months (+25%). It is also proposed that this surveillance frequency be revised to every 24 months (+25%). This change is also being made in accordance with the guidance in Generic Letter 91-04.

Test data from 1986 through 1993 was reviewed which encompasses five refueling outages. Only minor observations were noted in one instance during 1989. These observations were not repeated in future surveillances.

The Containment Fan Cooler Fire Protection System is a static system which is normally not required to operate. The tests and inspections verify system integrity and continued operability in the unlikely event that it is needed. The minor observations noted in past surveillances would have had negligible effect on actual operation of the system if it had been required to operate. Under these circumstances, for a static system with proven reliability, increasing the time interval between surveillances would have negligible impact upon operability of the system.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   (a) It is proposed that the functional test surveillance interval for the Electrical Tunnel, Diesel Generator Building and Containment Fan Cooler Fire Protection Spray Systems be changed from every 18 months (+25%) to every 24 months (25%).

   (b) It is proposed that the Spray Header visual inspection interval be revised from every 18 months (25%) to 24 months (+25%).

Extension of the surveillance interval for Electrical Tunnel and Diesel Generator Building Fire Protection System functional tests will have virtually no impact upon the operability of these systems. These systems are accessible during normal operation and other sections of the Technical Specifications (4.14.A.1.g.(i) and 4.14.B.1.a(i)) require that the system valve tests be conducted on an annual (12 month) basis. These annual tests would reveal any system deterioration prior to the conclusion of the proposed extended surveillance interval.

For the Fan Cooler Fire Protection System as well as the Spray Header itself, evaluation of surveillance data from the past five refueling outages indicates minor discrepancies which would not have impaired system operability.

It is therefore concluded that extension of the proposed surveillance interval will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

For the Electrical Tunnel and Diesel Generator Building, extension of the surveillance interval will have a negligible affect as other portions of the Technical Specifications require the same surveillance on an annual basis. For the spray header and the fan cooler fire protection system, historical surveillance data validates operability over an 18 month (+25%) interval which lends confidence to conclude that operability will be maintained over a 24 month (+25%) interval. It is therefore concluded that the possibility of a new or different kind of accident from any accident previously evaluated has not been introduced.

3. There has been no reduction in the margin of safety.

Extension of the surveillance for two systems will have minimal impact as the Technical Specifications impose more frequent testing for system valves on an annual basis. For the Spray Header and Fan Cooler Fire Protection System, as well as the fire protection system for the Diesel Generator Building and Electrical Tunnel, it can be stated that these systems are static existing mainly in a standby capacity under which little deterioration would be expected. Past surveillance data validates system reliability. It is therefore concluded that increasing the time interval between inspections would not involve a significant reduction in the margin of safety.

SAFETY ASSESSMENT

PENETRATION FIRE BARRIERS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.14.C.1.a requires visual inspection of the penetration fire barriers listed in the Technical Specifications at least once per refueling interval. Currently, this inspection has been performed at least once per 18 months (+25%) interval. It is proposed that the inspection interval be extended to 24 months (+25%). This change is being made in accordance with the guidance in Generic Letter 91-04.

Fire protection and detection systems are provided to protect equipment required for the safe shutdown of the unit. These systems are periodically tested and inspected in accordance with the surveillance program to assure their operability and to identify for corrective action any conditions which could prevent any portion of these systems from performing its intended function. One of these systems is the Fire Barriers.

The penetrations of concern are as follows:

a. penetration fire barriers between the Central Control Room and the Cable Spreading Room (CSR)

b. penetration fire barriers between the 480v switchgear room and the CSR, and

c. penetration fire barrier between the Primary Auxiliary Building (PAB) and the electrical tunnel.

Review of past test data for the above areas indicates the following results:

a. Test data from 1988, 1989 and 1990 were reviewed. The 1988 test indicated that 9 out of 198 penetrations with multiple seals were less than satisfactory. In 1989, 13 of 198 penetrations required maintenance. In 1990, all 203 penetrations were found to have acceptable seals. The few unacceptable seals found in the earlier tests would not have jeopardized the integrity of the fire barrier.

b. Test data from 1988, 1989, 1990 and 1991 were reviewed. The scope of the inspection covered 113 penetrations. Only one seal in 1989 was found to be inadequate which was attributed to maintenance activity in the area which affected the seal.

c. Test data from 1988, 1989, 1990 and 1991 were reviewed. One inadequate seal was found in 1989 and one inadequate seal was found in 1990. In neither case would the inadequate seals have compromised the integrity of the fire barriers.

An evaluation of the seal inspection results discussed above indicates that the unacceptable results were due to initial sealing efforts and were not due to deterioration as a result of time. Once initial sealing problems were resolved, subsequent inspection has been satisfactory.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the visual inspection frequency of the penetration fire barriers listed in the Technical Specifications be changed from every 18 months (+25%) to every 24 months (+25%).

   The fire barrier penetration seals are static devices existing in standby status. Normal environmental conditions exist during normal plant operations. The only deterioration expected would be that due to aging in a normal ambient which would be minimal to non-existent. Evaluation of unacceptable seals detected during surveillances indicates that initial seal installation was faulty and aging was not the cause. Surveillances during four refueling outages confirm this evaluation. Accordingly, it is not expected that the proposed change in surveillance interval will involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   Past surveillances indicate that time is not a predominate failure mechanism. In the few unacceptable seals detected, the initial installation procedure has been identified as the cause of the problems. Since the seals are static devices which exist in a standby condition and experience normal ambient conditions during normal operation, this would be the expected conclusion. In addition, the fire barriers are just one means of fire protection. Other means of fire protection exist such as fire alarms, sprinklers and heat detectors which provide defense in depth. Thus, it is concluded that the proposed change in the surveillance interval will not create the possibility of a new or different kind of accident from that previously evaluated.

3. There has been no reduction in the margin of safety.

   Aging has not been identified as a principle contributor to seal failures. In addition, there exists additional means of fire protection which provides defense in depth. Therefore, the proposed change in surveillance intervals is not expected to involve a significant reduction in the margin of safety.

SAFETY ASSESSMENT

SMOKE DETECTORS/ELECTRICAL PENETRATION AREA INSIDE CONTAINMENT

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247

DESCRIPTION OF CHANGE

Technical Specification 4.14.D.1.a.(ii) requires verification of operability of the smoke detectors in the electrical penetration area within containment each refueling. Currently, this is performed every 18 months (+25%). It is proposed that this refueling frequency be revised to every 24 months (+25%). This change is being proposed in accordance with the guidance contained in Generic letter 91-04.

There are five smoke detectors located in the electrical penetration area within containment. During normal plant operation three of the five are required to be operable. Six completed surveillances including 1984, 1986, 1987, 1989, 1991 and 1993 were reviewed. No failures have been observed and it is concluded that these devices are highly reliable.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the surveillance interval for the smoke detectors located in the electrical penetration area inside containment be revised from every 18 months (+25%) to every 24 months (+25%).

   Based on data taken from six surveillances from 1984 through and including 1993, these devices have proven to be highly reliable. No test failures were observed during this period. Based on the guidance contained in Generic Letter 91-04, this demonstration of reliable performance provides an adequate basis to conclude that the proposed extension in the surveillance interval will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

   Only 3 of the 5 detectors are required during normal operation. Past surveillance data from six refueling outages indicate that it is reasonable to expect all 5 detectors will remain operable over the extended operating cycle which provides margin. It is therefore concluded that the possibility of a new or different kind of accident from any accident previously evaluated has not been created.

3. There has been no reduction in the margin of safety.

   The proven reliability of these devices indicates that a significant reduction in the margin of safety would not be involved in extending the operating cycle to 24 months (+25%).

DESCRIPTION OF CHANGE

Technical Specification 4.16.C.2 requires that each Containment Sump Pump shall be operated under visual observation to verify that the pumps start and stop at the appropriate setpoints and that the discharge flow is at least 25 gpm per pump each refueling interval. Currently, this surveillance is performed on an 18 month (+25%) interval. It is proposed that the surveillance interval be extended to 24 months (+25%). This change is being made in accordance with the guidance in Generic Letter 91-04.

No credit is taken for the Containment Sump Pumps in the safety analysis of the plant. Their primary function is to transfer radioactive waste stemming from leaks during normal operation or spills during maintenance from Containment to the waste holdup tanks which are located in the Primary Auxiliary Building for waste disposal processing. During normal operation, the pumps and sump level monitors perform an important role in assessing the magnitude of unidentified leakage within Containment. Therefore, continued operability during normal operation is important.

In addition to the surveillance performed at refueling intervals, there is an almost identical Technical Specification requirement to verify that each pump starts and that a discharge flow of 25 gpm is verified. Due to this monthly test, extension of the refueling interval test would have virtually no impact upon assuring pump operability over an extended operating cycle.

To assess operability of the setpoints for start and stopping, test results from 1986, 1987, 1989, 1990, 1991 and 1993 were reviewed. In only one instance were the setpoints found to be out of tolerance. However, it was concluded that this one time event was not time-dependent. Therefore, an extended operating cycle would not be expected to induce a similar type failure.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed change does not involve a significant hazards consideration since:

1. There is no significant increase in the probability or consequences of an accident.

   It is proposed that the functional test of the Containment Sump Pump be changed from every 18 months (+25%) to every 24 months (+25%).

   No credit is taken within the FSAR for the Containment Sump Pumps as a means of mitigating the consequences of an accident. During normal operation the pumps serve as a means of quantifying leakage inside Containment and therefore serve a safety function in terms of accident prevention. However, in this capacity they are only one of several systems which are capable of serving this function and their failure would not result in a loss of this capability.

   In addition, evaluation of surveillance data back to 1986 indicates, with one exception, that the devices are very reliable. In one instance, the pumps did not actuate or cause operation within the setpoint tolerance but did operate as required. This was determined not to be a time dependent event.

It is therefore concluded that extending the interval between refueling surveillances will not result in a significant increase in the probability or consequences of an accident.

2. The possibility of a new or different kind of accident from any previously analyzed has not been created.

Past surveillances indicate that time is not a predominate failure mechanism. Also, there exists a Technical Specification requirement to perform almost the same surveillance on a monthly basis in addition to every refueling outage. This monthly test diminishes any potential risk in extending the operating cycle. It is therefore concluded that the possibility of a new or different kind of accident from any previously analyzed has not been created.

3. There has been no reduction in the margin of safety.

Past surveillance data indicates that pump operation is reliable. In addition, there are alternate means of providing the safety function fulfilled by these pumps. Also, a monthly test is required which would detect any malfunction prior to the end of an extended operating cycle. It is therefore concluded that extending the operating cycle by several months will not result in a significant reduction in the margin of safety.