

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSOLIDATED EDISON COMPANY OF) Docket Nos. 50-3
NEW YORK, INC.) 50-247
(Indian Point Station,)
Units Nos. 1 and 2))
AND)
POWER AUTHORITY OF THE STATE) Docket No. 50-286
OF NEW YORK)
(Indian Point 3 Nuclear Power Plant))

APPLICATION FOR AMENDMENT TO OPERATING LICENSES

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Provisional Operating License No. DPR-5 and Facility Operating License No. DPR-26, and the Power Authority of the State of New York ("Power Authority"), as holder of Facility Operating License No. DPR-64, hereby apply for an amendment to the Environmental Technical Specification Requirements ("ETSR") contained in Appendix B to each license.

This Application concerns the Table of Contents, Definitions, Limiting Conditions For Operation, Monitoring Requirements and Annual Environmental Operating Report: Pages i-v; Section 1.2, Nonroutine Reportable Environmental Occurrence; Sections 2.1 and 3.1, Thermal; Sections 2.2 and 3.2, Hydraulic; Sections 2.3 and 3.3, Chemical; and Section 5.6.1.1(IP1,2) and Section 5.6.1a(IP3).

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In this Application we propose revisions of the ETSR that better distinguish Limiting Conditions and Monitoring Requirements, eliminate repetitive specifications, reporting requirements and bases, and bring the ETSR up to date. This update also includes changes contained in Con Edison's July 20, 1979 and the Power Authority's August 31, 1979 applications to the NRC to amend Appendix A Technical Specifications. In those applications radiological requirements of the Appendix B ETSR were deleted from Appendix B and added to Appendix A. The proposed revisions in the ETSR reflect current technology and the completion and submittal of studies and reports required by the ETSR. We have also proposed relaxation of the response times of some reporting requirements which we believe are unnecessarily short. Substantial editing has been done to clarify the language of the ETSR.

No environmental impacts would occur as a result of these proposed revisions to the ETSR. Although Limiting Condition specifications are revised, their operational content is unchanged. Similarly, Monitoring Requirement specifications are revised but sampling, analysis and recording of parameters of site effluents are not reduced.

Attachment A to this Application describes the bases for the specific amendment request. Attachment B to this Application contains revised pages of the ETSR with the amendments requested. Attachment C to this Application is

an environmental impact evaluation and cost-benefit analysis of the amendments requested in the Application.

This request has been reviewed and approved by Con Edison's Environmental Protection Committee and by the Power Authority's Plant Operating Review Committee and its Safety Review Committee. It involves no change in plant operations at Indian Point, no change in environmental effects related to plant operations and no change in types and amounts of effluents from the site.

Subscribed and Sworn to before me this 3rd day of December 1979

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

Angela Roberti
Notary Public

BY William J. Cahill, Jr.
William J. Cahill, Jr.
Vice President

ANGELA ROBERTI
Notary Public, State of New York
No. 41-8593813
Qualified in Queens County
Commission Expires March 30, 1980

Subscribed and Sworn to before me this 30 day of November 1979

POWER AUTHORITY OF THE STATE OF NEW YORK

Ruth G. Zapp
Notary Public

BY Earl

RUTH G. ZAPP
Notary Public, State of New York
No. 30-4663428
Qualified in Nassau County
Commission Expires March 30, 1980

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STATE OF NEW YORK)
COUNTY OF NEW YORK) ss:
COUNTY OF NEW YORK)

AFFIDAVIT OF SERVICE

Michael Blatt, being duly sworn, states: That he is a Senior Engineer employed by Consolidated Edison Company of New York, Inc., and that he has, this 7th day of December 1979, served the foregoing document entitled "Application for Amendment to Operating Licenses" fully executed on December 3, 1979, by mailing copies thereof, first class postage prepaid and properly addressed to the following person:

Honorable George V. Begany
Mayor, Village of Buchanan
188 Westchester Avenue
Buchanan, New York 10511

Michael Blatt
NAME

Sworn to before me this
7th day of December, 1979

Susan D. Zaretsky
Notary Public

SUSAN D. ZARETSKY
NOTARY PUBLIC STATE OF N.Y.
NO. 30 4634714 NASSAU COUNTY
COMMISSION EXPIRES MARCH 30, 1980

ATTACHMENT A

BASES FOR AMENDMENT APPLICATION

Since December 12, 1975 Sections 1, 2, 3 and 4 of the Environmental Technical Specification Requirements (ETSR) for Indian Point 1 and 2, owned and operated by Con Edison, and Indian Point 3, owned and operated by the Power Authority, have been identical. The identical requirements of the first four sections of the ETSR are necessitated by use of a common discharge canal with the associated environmental effluent monitoring and a combined site with common monitoring and surveillance programs. Section 5 of the ETSR, Administrative Controls, is specific to each owner-operator. This Amendment application concerns sections 1, 2, 3 and 5 of the ETSR.

Since 1975 the ETSR has been amended several times, has been the subject of audits and inspections and has provided the basis for preparation and implementation of numerous plant and surveillance procedures. These activities have shown the ETSR is subject to legitimate differences in interpretation of specific sections. We have proposed changes in the ETSR that clarify the language of these sections. The changes proposed fall into five broad categories.

1. The Limiting Conditions for Operation (LCO) and the Monitoring Requirements are clearly distinguished. In some instances in the current ETSR the distinction is unclear because the LCO contains specifications or reporting requirements that are more appropriately Monitoring Requirements.

2. Redundancies in the ETSR are eliminated. There are numerous instances in the current ETSR of repetition in LCOs, Monitoring Requirements, reporting requirements and Bases. This lengthens the ETSR and obscures equally important but more succinctly presented information.

3. Special one-time requirements of the ETSR that have been fulfilled by the licensees have been deleted. In 1975 when the ETSR was written, in anticipation of the start of Indian Point 3 operations in 1976, the ETSR contained certain requirements of fixed duration associated with the environmental effects of the simultaneous operation of Indian Point 2 and 3. Where these requirements have been fulfilled their retention in the ETSR may be misleading because

it is not readily apparent that the requirement has been satisfied.

4. Relaxation of the requirement for several prompt reports and their replacement by 30-day reports has been requested. In these cases the corrective action concerning the anticipated LCO or monitoring infraction is in no way affected by the prompt reporting requirement.

5. In the process of making the changes described above the ETSR was rewritten wherever it was believed clarity and brevity could be achieved with no loss of meaning.

The bases for modification of specific ETSR sections are summarized below.

BASES FOR MODIFICATION OF CURRENT ETSR SECTIONS

<u>Page</u>	<u>Section</u>	<u>Bases</u>
i	Table of Contents	The titles of Sections 2.1.1, 2.1.4 and all of 2.2 are changed. The title of 2.3.1 is changed. Section 2.4 was deleted by Con Edison's July 20, 1979 and the Authority's August 31, 1979 applications.
ii	Table of Contents	The titles of the monitoring requirements of Section 3.0 have been changed to correspond to the Section 2.0 changes.
iii	Table of Contents	Section 4.1.1.b. and 4.2 were deleted by Con Edison's July 20, 1979 and the Authority's August 31, 1979 applications. The titles of Sections 5.1, 5.2, 5.3 and 5.4 are changed.
iv	Table of Contents	The page number of Figure 2.1-1 is changed. Figure 4.1-2 is actually 4.1-3. 4.2-1a and b were deleted by another application.
v	Table of Contents	The title and page numbers of Table 2.3-1 are changed. The page numbers of Table 2.3-2 are changed.
1-1	1.1.1	A definition for corrective action is added.
1-1	1.2.1	This definition is changed consistent with Section 5.6.2.
1-1	1.2.2	The reference to radioactive was deleted by

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		Con Edison's July 20, 1979 and the Authority's August 31, 1979 applications.
2.1-1	2.0	The "general" paragraph has been changed to "note" and moved to the end of Section 2.0.
2.1-1	2.0	In the "applicability" paragraph "a national power emergency" is changed to "emergency conditions." Applicability is to nonradiological matters.
2.1-1	3.0	"Applicability" is rewritten adding "monitoring" and "Indian Point" Station and deleting the words "analytical data from the environmental monitoring survey." "Analytical evaluation" refers to analyses of substances in Table 2.3-1, Liquid Effluent Monitoring Survey. The scope of this evaluation is already covered by "routine analysis." Applicability is to nonradiological matters. The "objective" has been expanded to include "routine monitoring" and "wastes" and to delete radiological matters.
2.1-1	3.1	"Applicability" is modified. Plant monitoring does not include monitoring in the river. Surveillance programs in Section 4.0,

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		where applicable, provide for monitoring in the Hudson River. It is the purpose of the surveillance programs of Section 4.0 to analyze and evaluate environmental monitoring survey data to establish the relationship between station effluents and the Hudson River.
2.1-2	2.1.1.1(a)	This LCO has been rewritten to combine (a) and (f).
2.1-2	2.1.1.1(b)	"With all pumps operating" has been added to the LCO to clarify the operating mode.
2.1-2	3.1A.	3.1A is deleted. The objective to establish that thermal releases will conform with applicable regulations is an objective of Section 4.0, Thermal Plume Mapping. The objective of the monitoring program is to maintain compliance with limiting conditions for operation. This was proposed in the Application of April 12, 1979.
2.1-2	3.1.1.1	In this specification "Unit" is substituted for "individual".
2.1-3	2.1.1.1(c) and (d)	These sections are combined as a new 2.1.1.1(c) because 31F is the LCO in both sections. In addition, since 10% of normal flow specified in 2.1.1.1(d) exceeds the

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		capacity of one 80,000 gpm deicing pump the relationship of the ICO to pump operations is expressed directly. Although deicing pumps are not used at Unit 1, it is not a factor at this time for this ICO because Unit 1 is not operating.
2.1-3	2.1.1.1(e)	(e) becomes (d) and is revised based on the reasoning described above.
2.1-3	2.1.1.1(f)	(f) was combined with (a).
2.1-3	2.1.1.1(g)	(g) becomes (e).
2.1-3	2.1.1.2	A provision for corrective action beyond 24 hours is specified. Reporting requirements are rewritten and combined with other reporting requirements in Section 3.1.1.7.
2.1-3	3.1.1.3	The accuracy and sensitivity specifications are rewritten commensurate with the instrument <u>system</u> capabilities. Previously accuracy and sensitivity applied only to the sensor components of the system. The recorder operation, recording and reporting requirements are rewritten consistent with the intent of the specification. Reporting requirements are moved to 3.1.1.7.
2.1-3	3.1.1.4	The first sentence of 3.1.1.4 is virtually identical to the first sentence of 3.1.1 and should be deleted. The

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		second sentence is reworded and becomes the first sentence. "Maximum" is deleted since it is derived from daily data and not determined instantaneously. References to requirements related to Section 4.0 are deleted in amendment application of April 12, 1979. The meaning of results is clarified and reporting requirements moved to 3.1.1.7.
2.1-4	2.1.1.3	Deleted per April 12, 1979 application to amend ETSR.
2.1-4	3.1.1.5	The word "manual" is deleted. It needlessly restricts measurement options.
2.1-4	3.1.1.7	The requirement for a "prompt" report in the event of equipment malfunction is inconsistent with monitoring requirements of 3.1.1.5. 3.1.1.5 states that temporary malfunctions are not restrictive on operations and up to 14 days are permitted for restoration of operations. A 30-day report is appropriate.
2.1-4 to 7	Bases for 2.1.1	The bases for the LCO have been rewritten to remove redundancies and dated historical information. Editorial changes clarifying the bases have been made as well as their relationship

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		to the LCO. The first paragraph describes factors affecting ΔT_c and contains typical design bases ΔT_c . Since ΔT_c is a function of flow and pump status these are given in the second paragraph. The relationship of ΔT_c to seasonal factors is contained in the remaining paragraphs.
2.1-4 to 7	Bases for 3.1.1	The bases for monitoring has been rewritten to describe transmittal, monitoring and recording of intake and discharge temperatures and differences of temperature at one location. It is unnecessary to restate in the bases for the monitoring requirements the bases for the limiting conditions of operation.
2.1-7	Objective of 2.1-2	The biological objective of the LCO is added to the objective and deleted from the bases of 2.1.2.
2.1-7,8	2.1.2.1 and 2.1.2.2	The specification is revised to delete "objective" and "bases" information. 2.1.2.2 is combined with 2.1.2.1. Provision is made for corrective action.
2.1-8	2.1.2.3	2.1.2.3 is renumbered 2.1.2.2 and rewritten consistent with the formula contained in Definition Section 1.5.3.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		Provision is made for corrective action.
2.1-8	2.1.2.4	2.1.2.4 is a reporting requirement and combined with 3.1.2.2. Specific references are added.
2.1-8	3.1.2.2	The specification has been rewritten to delete repetitive information. Transmittal to and recording of discharge canal temperatures in the same control room as the intake temperatures is described in the bases for 3.1.1.7.
2.1-8	3.1.2.3	This section is deleted because it is repetitive. The monitoring and recording requirements duplicate information described in the bases for 3.1.1.7. The reporting requirements are contained in 3.1.2.2.
2.1-8	3.1.2.4	3.1.2.4 is deleted because it repeats the requirements of Section 3.1.1.5.
2.1-8	3.1.2.5	This section is deleted. The requirements with respect to the temperature recorder are covered by Sections 3.1.1.5 and 3.1.1.7. The requirement of a prompt report with respect to the program annual reporting requirement is inapplicable.
2.1-8 and 9	Bases for	The bases for 2.1.2

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	2.1.2	are rewritten and the biological objective moved to the objective statement.
2.1-9	2.1.3.1	The words "the sum of" are deleted.
2.1-9	Bases for 2.1.3	The bases is revised to emphasize the site limit and explain the basis for determining the rate of heat rejected.
2.1-9	3.1.3.1	The specification is rewritten to clarify that the daily average of the rate of heat rejected is not determined by averaging 24 one-hour values and that the calculation and report requirements are for the site.
2.1-11	2.1.4	The Section is modified to reflect concern for temperature changes in the discharge canal of the CWS and it is in the discharge canal that the temperature increases are determined. The means of attaining the objective is deleted from the objective. The objective with respect to aquatic biota is added.
2.1-11	2.1.4.1	This specification is reworded to emphasize concern with time intervals of one hour. Exceptions and corrective action are provided for in 2.1.4.2.
2.1-11	2.1.4.2	This specification is modified and combined with

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		2.1.4.3 "Objective" information is deleted.
2.1-11	3.1.4	The Section is modified to reflect concern for temperature changes in the discharge canal of the CWS and it is in the discharge canal that the temperature increases are determined. The "objective" information deleted is appropriate information for a plant procedure and the objective of the LCO.
2.1-11	3.1.4.1	This specification is revised to delete requirements appearing previously in the specifications and include requirements consistent with the LCO.
2.1-11	3.1.4.2	Based on experience there have been no observations of fish undergoing thermal stresses from any rates of temperature change. The specification should be deleted.
2.1-12	2.1.4.4	Inclusion of the reporting requirements of this specification are duplicated by the reporting requirements in Section 3.1.4.1. However, the reporting requirement is changed from a prompt to a 30-day report because there is no technical reason for a prompt report. Since the monitoring of discharge canal water temperature is specified earlier in

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		Sections 3.1.1.1 and 3.1.1.2 there is no need to repeat the specification in 3.1.4.1.
2.1-12	Bases for 3.1.4	The Bases for 3.1.4 is revised. The second sentence is deleted because it is not relevant to monitoring and reporting. The third sentence is deleted because it is a duplicate monitoring requirement of existing specification 3.1.4.2, proposed for deletion, and not a bases.
2.1-13	Figure 2.1-1	The approximate points of intake water temperature monitoring are relocated. The figure is on page 2.1-9.
2.2-1	2.2	The "objective" statement is not an objective of the LCO of the CWS and is deleted.
2.2-1	2.2.1	The title is changed consistent with the operational specification.
2.2-1	2.2.1.1	This section is deleted. Under normal operating conditions the limit specified is adhered to as a result of the design of the system and is not mediated by plant operations. The limit can not be exceeded. The submerged Weir Feasibility Study was completed and submitted to the NRC by letter dated April 17, 1978. (Texas Instruments. <u>Evaluation of A Submerged</u>

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		<u>Weir to Reduce Fish Impingement At Indian Point. 1978)</u>
2.2-1	3.2.1	The title is changed consistent with 2.2.1 above. The objective has been deleted because it restates the objective in Section 3.2.
2.2-1	3.2.1.1	Since the limiting condition is not needed the monitoring for that specification is not needed. 3.2.1.1 is deleted.
2.2-2	2.2.1.2	The specification is revised and updated. Provision is made for corrective action. The Section is numbered 2.2.1.1.
2.2-2	2.2.1.3	Reporting requirements are rewritten and moved to 3.2.1.1.
2.2-2 and 3	Bases of 2.2.1	Bases are revised consistent with the objectives of the specified limiting condition.
2.2-2	3.2.1.2	The monitoring requirement is revised consistent with the specified limiting condition. Temperature measurement requirements are redundant to 3.1.1.1. Reporting requirements of 2.2.1.3 are added. The requirement is renumbered 3.2.1.1. Confirmation of intake velocity values is the subject of a report nearing completion.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
2.2-2 and 3	Bases of 3.2.1	The bases are deleted because they are not related to the monitoring specification. A bases is substituted that is relevant to the specified monitoring condition.
2.2-4	2.2.2	The title is changed consistent with the operational specification.
2.2-4	2.2.2.1	The specification is rewritten to focus on the LCO. Measurement, recording and reporting are monitoring activities of Section 3.0. The relationship of temperature and head differential described in 2.2.2.2 is combined with 2.2.2.1. Provision is made for corrective action.
2.2-4	3.2.2 and 3.2.2.1	The title is changed consistent with 2.2.2. The objective and specification have been reworded
2.2-5	2.2.2.2	The appropriate parts of 2.2.2.2 have been moved to Section 2.2.2.1. Section 2.2.2.2 is deleted.
2.2-5	2.2.2.3	Section 2.2.2.3 is renumbered 2.2.2.2.
2.2-5	3.2.2.2 3.2.2.3	These sections are deleted (and a revised 3.2.2.2 is provided for reporting) because they duplicate requirements of the thermal plume mapping program of

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		Section 4.0. See Bases for 3.2.2 below.
2.2-6	Bases of 2.2.2	The bases of the LCO is rewritten consistent with the LCO.
	Bases for 3.2.2	The bases is rewritten consistent with the monitoring performed and the taking of field measurements. The results are contained in a report submitted to the NRC by letter dated March 19, 1976. (Dames & Moore and Consolidated Edison Company of New York, Inc. <u>Indian Point Nuclear Generating Station Intensive Thermal Survey Program, August and October 1974, Volume No. 1.</u> March 1976.)
2.3-1	2.3 Applicability	"Solids" is changed to "disposal of solid wastes at".
2.3-1	2.3 Specification	The specification is revised to provide for corrective action.
2.3-Various	3.3 Applicability	The "applicability" sections generally are repetitive of the applicability statement on page 2.3-1. Repetitive applicability statements are deleted. This applicability section is rewritten.
2.3-1	3.3 Objective	The sentence is revised after "chemicals".
2.3-1	3.3 Specification	This specification is modified.

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2.3-2	2.3.1.1	The first sentence is reworded.
2.3-2	2.3.1.2	The specification is reworded to emphasize the prohibition of simultaneous chlorination of more than one unit.
2.3-2	3.3.1 Objective	The objective is revised. After "... cooling system..." is added "to determine...operation."
2.3-2	3.3.1.1a	Delete: "at the confluence of the discharge canal with the Hudson River" and substitute "at point 2 of Figure 2.1-1". Compliance with chlorine LCOs resulting from condenser chlorination is assured at the confluence with the Hudson River if attained at point 2.
2.3-2	3.3.1.2	The first sentence is made more specific. The "bases" information, "...to assure...analyzed.", is deleted.
2.3-3	2.3.1.4	The first sentence is reworded. The specification previously numbered 2.3.1.7 is combined with 2.3.1.4 except "bases" information is deleted.
2.3-3	2.3.1.5	This section is a monitoring requirement. It has been retained as the proposed Specification 3.3.1.5.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
2.3-3	3.3.14	This section has been reworded.
2.3-3	3.3.1.3	Single operator precision and accuracy is most appropriately determined using methods approved by ASTM. Standard Methods provide a historical basis for selecting a method but not a basis for evaluating how the method was applied in the laboratory.
2.3-3	3.3.1.5	This section is proposed for deletion. There are no fish in the discharge canal and there is sufficient dilution in the river to ensure protection of biota. If any impacts occurred, which is unlikely, they could not be observed in the river.
2.3-4	2.3.1.6	This section duplicates 3.3.1.4 and should be deleted except as follows. Chlorination of condensers is very infrequent and it is unnecessary to determine chlorine demand on a weekly basis.
2.3-4	2.3.1.7	Delete 2.3.1.7. It is modified and combined with 2.3.1.4.
2.3-4	3.3.1.6	The specification is deleted because IP3 has operated more than a year and the specified reporting was completed.
2.3-4 and 5	Bases for 2.3.1	Bases are reworded beginning at the sixth line. Timing of condenser chlorination to avoid

<u>Page</u>	<u>Section</u>	<u>Bases</u>
		coincident release with nitrogenous materials is not practicable because blow down is continuous while the plant(s) is (are) on line and hydrazine and ammonia are used in boiler water treatment. Since condenser chlorination is very infrequent avoidance of release of nitrogenous compounds and simultaneous chlorination is an inconsistent basis for operations. (<u>Progress Report for 1975 Hudson River Ecosystems Studies- Effects of Temperature and Chlorine on Entrained Hudson River Organisms.</u> NYU 1975.)
2.3-6	2.3.2.1	"Total chromium" is deleted because the only detectable form of chromium that has been found is chromate ion.
2.3-6	Bases of 2.3.2	"Total chromium" is deleted since only chromate ions are detected. "Limiting the concentrations to small amounts..." is changed to "Limiting the concentrations as specified..."
2.3-6	3.3.2.1	Analysis for chromium in the discharge canal shows it is at a level below accurate detectability of the analysis method. Concentration of chromium in the discharge canal is accurately determined by usage.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
2.3-6	3.3.2.2	The Drewgard 100 that is used at Indian Point is certified free of zinc and other heavy metals. Therefore the specification that it be segregated is unnecessary. The Bases is also modified accordingly.
2.3-6	3.3.2.3	Report of accidental release of small quantities of corrosion inhibitors is trivial. An accidental release in excess of 50% of the limit is reasonable.
2.3-7	3.3.3	The objective is expanded.
2.3-8 and 9	2.3.3.1	The last paragraph, page 2.3-8, is deleted because it is redundant to the first paragraph. The first paragraph is reworded.
		The first paragraph, page 2.3-9, concerning dissolved oxygen, is deleted because the dissolved oxygen surveys required by the State in its 401 Certification proved that plant operations did not contravene applicable standards. The State suspended the survey requirement of the 401 Certification on August 4, 1978.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
2.3-8 and 9	3.3.3.1	The intent of analyzing samples during accidental releases is to diligently assess the water chemistry. The circumstances of an accidental release may preclude hourly sampling. The appropriate back up for an instrument is another suitable instrument. The frequency of analysis unless otherwise specified is contained in Table 2.3-1. The first sentence of the paragraph on pH measurements is rewritten.
2.3-10	2.3.3.2	Gases from the package boilers are emitted through the superheater stack.
2.3-11	2.3.3.3	"Dispersed" is changed to "disposed of".
2.3-11	2.3.2.3	This section has been reworded and as a general reporting requirement moved to the end of Section 3.3 specification.
2.3-11	3.3.3.3	The specification is revised to delete reference to the specific content of the referenced sections 4.1.2a(3) and 5.6.1.2. (IP1,2) and 5.6.1.b (IP3) If these sections are revised in the future additional amendment of this section will not be necessary.
2.3-11	Bases of 3.3.3, first	This is an objective statement and has been

<u>Page</u>	<u>Section</u>	<u>Bases</u>
	paragraph	added to the objective of 3.3.3.
2.3-12	Bases of 3.3.3, third paragraph.	The paragraph is deleted. The reference to Section 4.1.2a(4), Special Studies is out of date. The survey was completed. (Consolidated Edison Company of New York, Inc. 1973. "The biological effects of chemical discharges at Indian Point." <u>Environmental Report Indian Point Unit No. 3, Appendix Z</u> . Also see, <u>The Effects of Temperature and Chlorine on Entrained Hudson River Organisms</u> . New York University Institute of Environmental Medicine. June 1976. Sent to NRC by letter dated July 2, 1976.)
	Bases, of 3.3.3 fourth paragraph	The paragraph is deleted. Water quality, in the sense of its chemical constituents, is not directly related to impingement of fish. This paragraph, in addition, is covered in Section 4.1.2.(a) and is duplicative in Section 3.0.
2.3-15	Bases of 3.3.4	Treatment of secondary coolant is for both IP2 and IP3.
2.3-17	Table 2.3-1	Orthophosphate is deleted. There are no plans for any use of orthophosphate. The table begins at 2.3-13.

<u>Page</u>	<u>Section</u>	<u>Bases</u>
2.3-17	Table 2.3-1	Determinations prior to discharge (PD) are used to establish required levels of treatment or form the basis of incremental changes.
2.3-18	Footnotes	1. New abbreviations are added to the notes. 2. Some substances are determined by usage. Point 2 is substituted for the point of confluence. 3. Chlorine demand must be determined prior to chlorination. Point 2 is substituted for the point of confluence.
2.3-19	Footnotes	6. and 7. are combined since they are substantially the same. 8. is renumbered 7. 9. is renumbered 8. and the sampling site specified.
2.3-21	Table 2.3-2	The dot (•) footnote should follow Soda Ash. The new page number is 2.3-17.
5.6-1	5.6.1.1 (IP1,2)	Reporting requirements are changed consistent with changes proposed for the monitoring requirements.
5.4	5.6.1a (IP3)	Reporting requirements are changed consistent with changes proposed for the monitoring requirements.