

John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2513

February 1, 1983

Re: Indian Point Unit No. 2
Docket No. 50-3

Indian Point Unit No. 2
Docket No. 50-247

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Dear Mr. Varga:

Consolidated Edison Company of New York, Inc. (Con Edison) transmits herewith (40) copies of revised Radiological Effluent Technical Specifications (RETS) which are provided in response to the request made by members of your staff at a meeting held on September 29 and 30, 1982 and committed to by our letter of December 1, 1982. This submittal modifies our previous submittal of July 20, 1979 based on the guidance contained in the draft 7 of revision 3 to NUREG-0472.

NUREG-0472's guidance to include demonstration of conformance to 40 CFR Part 190 in the semiannual report due after January 1 of each year has not been provided in our revised RETS submittal. The basis for this is that proposed Technical Specification 3.9.C regarding Uranium Fuel Cycle total dose already provides a mechanism for demonstrating compliance with 40 CFR Part 190. This specification requires that an analysis be performed to demonstrate compliance with 40 CFR Part 190 only when doses from radioactive effluents exceed twice any 10 CFR Part 20 or Appendix I (10 CFR Part 50) limits and that this analysis be reported to the Commission by means of a Special Report. To specify that compliance with 40 CFR Part 190 be demonstrated routinely in the semiannual report is inconsistent with the above mentioned specification. Therefore we prefer to omit this item from the semiannual report.

The proposed changes have been reviewed by the Station Nuclear Safety Committee and the Consolidated Edison Nuclear Facilities Safety Committee. Both committees concur that these changes do not represent a significant hazards consideration and will not result in an increase in the amounts of effluents or any change in the authorized power levels of the facilities.

A001
s
1/39

read w/out
orig.

8302170316 830201
PDR ADDCK 05000003
P PDR

In accordance with 10 CFR 170.22, a check in the amount of \$4,400.00 as a filing fee was enclosed with our letter of July 20, 1979, and no additional fee is required.

encl.

Very truly yours,

John D. O'Toole
Vice President

cc: Mr. Ronald C. Haynes,
Regional Administrator
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Mr. Thomas Foley,
Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, new York 10511

Hon. F. Webster Pierce

Subscribed and sworn
to me this day 1 of
February, 1983.



Notary Public

THOMAS LOVE
Notary Public State of New York
No. 31-2401883
Qualified in New York County
Commission Expires March 30, 1983