

ATTACHMENT A

PROPOSED TECHNICAL SPECIFICATION CHANGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
DOCKET NO. 50-247  
SEPTEMBER, 1993

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(iii) Summary description of action(s) taken to prevent a recurrence.

5. Liquid Holdup Tanks

- a. The quantity of radioactive material contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.
  - a. Refueling Water Storage Tank
  - b. Primary Water Storage Tank
  - c. 13, 14 Waste Distillate Storage Tanks
  - d. Outside temporary tank
- b. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank, take action within 48 hours to reduce the tank contents to within the limit, and describe the events leading to this condition in the next Semiannual Radioactive Effluent Release Report.

B. RADIOACTIVE GASEOUS EFFLUENTS

1. Gaseous Effluent Dose Rate

- a. The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the site boundary (see Figure 5.1-1) shall be limited to the following:
  - (i) for noble gases: Less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and

Table 3.9-1

Radioactive Liquid Effluent Monitoring Instrumentation

Instrument	Minimum Channels Operable*	Action
1. GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
a. Liquid Radwaste Effluent Line	(1)	1
b. Steam Generator Blowdown Effluent Line	(1)	2
2. GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Service Water System Effluent Line	(1)	3
b. Unit 1 - Secondary Boiler Blowdown Purification System (SBBPS) Effluent	(1)	3
3. FLOW RATE MEASUREMENT DEVICES		
a. Liquid Radwaste Effluent Line	(1)	4
b. Steam Generator Blowdown Effluent Line	(1)	4
4. TANK LEVEL INDICATING DEVICES**		
a. 13 Waste Distillate Storage Tank	(1)	5
b. 14 Waste Distillate Storage Tank	(1)	5
c. Primary Water Storage Tank	(1)	5
d. Refueling Water Storage Tank	(1)	5

\* During release by this pathway, channels shall be operable and in service during such release on a continuous, uninterrupted basis except that outages are permitted, within the time frame and limitations of the specified action, for the purpose of maintenance or required tests, checks and calibration.

\*\* 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 overflows and surrounding area drains connected to the liquid radwaste treatment system.

Table 4.10-2

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 <sup>(3)</sup>	Q <sup>(1)</sup>
b. Steam Generator Blowdown Effluent Line	D*	M	R <sup>(3)</sup>	Q <sup>(1)</sup>
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 <sup>(3)</sup>	Q <sup>(2)</sup>
b. Unit 1 Secondary Boiler Blowdown Effluent Line	D*	M	R <sup>(3)</sup>	Q <sup>(2)</sup>
3. FLOW RATE MEASUREMENTS DEVICES				
a. Liquid Radwaste Effluent Line	D <sup>(4)</sup>	N.A.	R	Q
b. Steam Generator Blowdown Effluent Line	D <sup>(4)</sup>	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.	R	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.

ATTACHMENT B  
SAFETY ASSESSMENT  
AND  
BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
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SAFETY ASSESSMENT

The proposed Technical Specification changes will remove a quantity limitation on radioactive contents and operability and surveillance requirements for level indicating devices for three empty tanks after the tanks are permanently isolated by cutting and capping of their inlet and outlet piping. These tanks are the 21, 22 and 23 boron monitor tanks, which were part of the boron recycle system, which is no longer used. Other portions of the boron recycle system, namely, the 22 boric acid evaporator, the 22 gas stripper and the 22 ion exchanger filter, were previously removed, as described in the report of changes, tests and experiments accomplished in 1987. This report was submitted on July 29, 1988, in accordance with 10 CFR 50.59(b)(2).

The function of the boron monitor tanks was to provide a sample point and storage for primary water before its transfer to the primary water storage tank. The purpose of the tank level indicating devices was to assure the detection and control of leaks that, if not controlled, could potentially result in the transport of radioactive materials to unrestricted areas.

These tanks are empty and unused. The implementation of these Technical Specification changes will be preceded by a plant modification to cut and cap the inlet and outlet piping of the tanks. Thus, the tanks will be permanently isolated, with the capability of liquid addition removed. With the tanks empty, and no possibility for addition, the limit on contents will become superfluous. In addition, the leakage concern will be eliminated, and level monitoring will no longer be required.

BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

The deletion of the three boron monitor tanks from the Technical Specifications will remove the quantity limitation on radioactive contents and the requirements for level monitoring capability and instrument surveillance. Level monitoring will no longer be required because the tanks are empty, and the inlet and outlet piping will be cut and capped to preclude any liquid addition. Since no addition can be made, the contents limitation also is no longer necessary.

In accordance with the requirements of 10 CFR 50.92, the proposed technical specification changes are deemed to involve no significant hazards consideration because operation of Indian Point Unit No. 2 (IP-2) in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The safety concerns with these tanks were the size of a potential release and the possibility of uncontrolled leakage of radioactive liquid effluent. Since the permanent isolation of these empty tanks eliminates these possibilities, the limit on quantity of contents will be superfluous, and the tank level indicating devices will not be needed to detect and control leakage. Thus, the probability and consequences of release or leakage are not affected.
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The limit on quantity of contents served only to limit the potential dose due to a release. Level monitoring was used only to assure detection and control of leakage from the tanks. Elimination of contents limitation and monitoring requirements will have no adverse impact on any other plant system or equipment and thus is not capable of creating the possibility of a new or different kind of accident.
- (3) Involve a significant reduction in a margin of safety. Replacement of the quantity limitation and tank level monitoring requirements with permanent isolation of the empty tanks will have no effect upon the margin of safety against release or uncontrolled leakage.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee and the Con Edison Nuclear Facilities Safety Committee. Both Committees concur that the proposed changes do not represent a significant hazards consideration and will not cause any change in the types or an increase in the amounts of effluents or any change in the authorized power level of the facility.