

ATTACHMENT A
TECHNICAL SPECIFICATION
PAGE REVISION

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

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1.0 DEFINITIONS

The following terms are defined for uniform interpretation of the specifications.

1.1 a. RATED POWER

A steady state reactor thermal power of 3071.4 MWT.

b. THERMAL POWER

The total core heat transfer rate from the fuel to the coolant.

1.2 REACTOR OPERATING CONDITIONS

1.2.1 Cold Shutdown Condition

When the reactor is subcritical by at least 1% $\Delta k/k$ and T_{avg} is $\leq 200^{\circ}F^*$.

1.2.2 Hot Shutdown Condition

When the reactor is subcritical, by an amount greater than or equal to the margin as specified in Technical Specification 3.10 and T_{avg} is $> 200^{\circ}F^*$ and $\leq 555^{\circ}F$.

1.2.3 Reactor Critical

When the neutron chain reaction is self-sustaining and $k_{eff} = 1.0$.

1.2.4 Power Operation Condition

When the reactor is critical and the neutron flux power range instrumentation indicates greater than 2% of rated power.

* For the one time, fuel out, chemical decontamination program only, this value will be $250^{\circ}F$.

ATTACHMENT B

SAFETY ASSESSMENT FOR COLD
SHUTDOWN REQUIREMENTS

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DESCRIPTION OF CHANGE

The specific proposed change set forth in Attachment A to our application seeks to revise, on a one time basis only, definition 1.2.1 of Appendix A of the Operating License. The proposed change would allow the definition of Tavg, for the cold shutdown condition, to be changed from $\leq 200^{\circ}\text{F}$ to $\leq 250^{\circ}\text{F}$ for purposes of conducting our intended fuel-out full reactor coolant system chemical decontamination program (FSD) during the plant's 1995 refueling outage. Concomitantly, the cut off temperature for hot shutdown will be increased from $>200^{\circ}\text{F}$ to $>250^{\circ}\text{F}$ as well. The chemical decontamination would be conducted in accordance with the requirements of WCAP-12932-A Rev. 2, which was reviewed and approved by the NRC on April 13, 1993.

Currently, the Technical Specification requires actions on several systems when the reactor is at or above cold shutdown conditions, as defined in section 1.2.1 of the Technical Specification. The reason for these actions fall into essentially two categories: reactor coolant system integrity protection and accident mitigation that includes control/prevention of releases to the environment. In the case of the former, it is recognized that protection of the Reactor Coolant System (RCS), and contiguous systems, against overpressurization at low temperature is essential to protect against brittle fracture. Thus, RCS Technical Specifications involving heatup/cooldown rates, chemistry limits, leakage, and over pressure protection will continue to be met during our full RCS chemical decontamination, as addressed in WCAP-12932-A Rev. 2. For the latter case, the Technical Specification involves actions for containment integrity (Section 3.6), engineered safety features (Section 3.3), snubbers (Section 3.12), fire protection (Section 3.13), instrumentation (Section 3.5.1), gas turbine generators (Section 3.7.C), and related surveillances that are relevant to fuel being in the reactor, as is normally the case at or above cold shutdown operating conditions and as reflected in the Standard Technical Specification definition of Mode (1.1). However, for the aforementioned process, measures for maintaining the reactor subcritical or protecting against the potential for highly radioactive gaseous releases in the event of any analyzed accident are obviated because the reactor will be defueled. All accidents are eliminated, except failure of a radwaste system which will be addressed. More specifically, preliminary analysis on the consequences of a potential failure in the system, that would result in flashing of the process fluid, revealed that 10 CFR 20 limits will not be exceeded. Likewise, Regulatory Guide 1.26 limit will not be exceeded. Further, as the effort will be conducted in accordance with the station's health physics and ALARA program, plant personnel will be adequately protected. Also, the FSD will be conducted under design conditions that are well within the design limits of the RCS and other affected systems. During the FSD process, the RCS essentially becomes a part of a radwaste system which extends to the Decon skid in the primary auxiliary building (PAB). As such, implementation of appropriate design and procedural controls consistent with the requirements of WCAP-12932-A Rev. 2 and the Nuclear Regulatory Commission's (NRC) regulations (including pertinent Technical Specification provisions) for radwaste systems should be sufficient and will not compromise safety. We intend to implement this effort in accordance with the provisions of 10 CFR 50.59.

Accordingly, the proposed one time change to Technical Specification 1.2.1 would provide relief from unnecessary Technical Specification actions for various systems, structures and components, while conducting the Full RCS chemical decontamination without fuel in the reactor. This relief would not compromise safety, would allow for the optimization of resources during the performance of this activity, and would reduce the potential for events that could adversely impact the scheduled 1995 outage.

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.

Approval of the proposed one time change to the Technical Specification definition of cold shutdown for purposes of performing the full RCS chemical decontamination without fuel in the reactor would provide relief from unnecessary technical specification action statements that are based on fuel in the reactor. Credible accidents with significant consequences are practically eliminated with the removal of the reactor fuel during the performance of the FSD. In addition, specific actions would be taken in accordance with the requirements of the NRC approved WCAP-12932-A Rev. 2 to ensure that RCS and affected interfacing systems integrity are preserved. Thus, system capability within established accident scenarios would not be compromised. The proposed amendment would therefore 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.

As noted above, the proposed amendment seeks to eliminate unnecessary Technical Specification action requirements during the performance of full RCS chemical decontamination. These actions are unnecessary because there will be no fuel in the reactor and the RCS and other affected systems will be operated under conditions well within their design capability during the implementation of this process. In addition, the FSD effort will be conducted in accordance with the requirement(s) of the NRC approved Westinghouse topical report WCAP-12932-A Rev. 2. Accidents involving failures of the decontamination process system will not exceed the bounding conditions for any previously established accidents involving failure of a radwaste system. Accordingly, the possibility of a new or different kind of accident from any previously analyzed will not be created.

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

The proposed amendment provides relief from technical specification actions in the performance of the FSD which become unnecessary when there is no fuel in the reactor. The change will not adversely impact any Technical Specification required systems, structures or components. The design capability of systems, structures or components impacted will not be reduced. Consequently, no significant reduction in the margin of safety for any system, structure, or component is involved.

Conclusions

The foregoing analysis demonstrates that the proposed amendment to the Indian Point 2 Technical Specifications does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident, and does not involve a significant reduction in a margin of safety. Therefore, Con Edison concludes that the proposed amendment does not involve a significant hazards consideration.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.