ATTACHMENT A

PROPOSED TECHNICAL SPECIFICATIONS CHANGES

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

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3.13 DELETED

4.14 DELETED

f. DELETED

g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

h. The Operations Manager shall hold a senior reactor operator license.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 The General Manager-Nuclear Power Generation shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3 The Watch Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 DELETED

6.5 REVIEW AND AUDIT

6.5.1 Station Nuclear Safety Committee (SNSC)

Function

6.5.1.1 The Station Nuclear Safety Committee shall function to advise the Vice President-Nuclear Power on all matters related to nuclear safety.

disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear Power and to the Nuclear Facility Safety Committee, and

k. review of changes to the Process Control Program and the Offsite Dose Calculation Manual,

l. review of the Fire Protection Program and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.

Authority

6.5.1.7 The Station Nuclear Safety Committee shall:

a. recommend to the Vice President-Nuclear Power, in writing, approval or disapproval of items considered under Specifications 6.5.1.6(a) through (d) above,

b. render determinations, in writing, with regard to whether or not each item considered under Specifications 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, and

c. provide immediate written notification to the Chairman, Nuclear Facilities Safety Committee of disagreement between the recommendations of the SNSC and the actions contemplated onsite. However, the course of action determined by the Vice President-Nuclear Power pursuant to Specification 6.1.1 above or the General Manager-Nuclear Power Generation pursuant to Specification 6.1.2 above shall be followed.

Records

6.5.1.8 The Station Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to, as a minimum, the Vice President-Nuclear Power and the Chairman, Nuclear Facilities Safety Committee.

a. The requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USAEC Regulatory Guide 1.33 (issued November 1972) except as provided in 6.8.2 and 6.8.3 below.

b. Process Control Program implementation.

c. Offsite Dose Calculation Manual implementation.

d. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

e. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with a written administrative control procedure approved by the appropriate General Manager, with the concurrence of the Station Nuclear Safety Committee and the Vice President, Nuclear Power. The administrative control procedure required by this specification shall, as a minimum, require that:

a. Each proposed procedure/procedure change involving safety-related components and/or operation of same receives a pre-implementation review by the SNSC except in case of an emergency.

b. Each proposed procedure/procedure change which renders or may render the Updated Final Safety Analysis Report or subsequent safety analysis reports inaccurate and those which involve or may involve potential unreviewed safety questions are approved by the SNSC prior to implementation.

c. The approval of the Nuclear Facilities Safety Committee shall be sought if, following its review, the Station Nuclear Safety Committee finds that the proposed procedure/procedure change either involves an unreviewed safety question or if it is in doubt as to whether or not an unreviewed safety question is involved.

Special Reports

6.9.2 Special reports shall be submitted to the NRC Regional Administrator of the Region I Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Each containment integrated leak rate test shall be the subject of a summary technical report including results of the local leak rate test since the last report. The report shall include analyses and interpretations of the results which demonstrate compliance in meeting the leak rate limits specified in the Technical Specifications.

b. DELETED

c. Sealed source leakage in excess of limits (Specification 4.15).

d. The complete results of the steam generator tube inservice inspection (Specification 4.13.C.).

e. Radioactive effluents (Specification 3.9).

f. Radiological environmental monitoring (Specification 4.11).

g. Meteorological monitoring instrumentation (Specification 3.15).

h. Inoperable radiation and hydrogen monitoring instrumentation (Specification 3.5) outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

i. Operation of overpressure protection system (Specification 3.1.A.4).

ATTACHMENT B

PROPOSED LICENSE CONDITION 2.K

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

H. Consolidated Edison Company of New York, Inc. shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Indian Point Station, Units 1 and 2 Physical Security Plan," with revisions submitted through July 25, 1989; "Indian Point Station, Unit 1 and 2, Security Guard Training and Qualification Plan," with revisions submitted through December 8, 1986; and "Indian Point Station, Units 1 and 2, Safeguards Contingency Plan," with revisions submitted through November 7, 1986.

I. Deleted by Amendment No. 133.

J. Deleted by Amendment No. 133.

K. Consolidated Edison Company of New York, Inc. shall implement and maintain in effect all provisions of the NRC-approved fire protection program as described in the Updated Final Safety Analysis Report for the facility. The licensee may make changes to the NRC-approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

ATTACHMENT C

SAFETY ASSESSMENT

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

DESCRIPTION OF CHANGE

This request (1) deletes Technical Specifications Sections 3.13 and 4.14 in their entirety and deletes paragraphs 6.2.2.f, 6.4.2 and 6.9.2.b; (2) adds paragraphs 6.5.1.6.1 and 6.8.1.e; and (3) replaces license condition 2.K. These changes are indicated in Attachments A and B and are consistent with the guidance provided in NRC Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications", dated August 2, 1988, and NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements", dated April 24, 1986.

(1) Deletion of Technical Specifications Sections

A. Technical Specification 3.13, "Fire Protection and Detection Systems", is deleted in its entirety. This specification addresses the high-pressure water fire protection system, the fire protection spray systems, penetration fire barriers (3), fire detection systems, fire hose stations and hydrants, and the cable spreading room halon system. This specification applies to the operability of fire protection, suppression, and detection equipment and identifies the quantities, types, and locations of equipment, flow paths, and water supplies required for the protection of safe shutdown systems. It also specifies actions to be taken when the minimum operability requirements for the equipment are not met.

Technical Specification 4.14, "Fire Protection and Detection Systems" (surveillance requirements), is also deleted in its entirety. This specification defines the periodic testing and inspections performed to verify the operability of the fire protection, suppression, and detection equipment described in section 3.13 to ensure that the minimum operability requirements are met in order to protect equipment utilized for safe shutdown of the plant.

These specifications are intended to ensure the implementation and maintenance of fire protection design features (e.g., detection, suppression, and fire barriers) described in the fire protection program. However, the fire protection program will continue to require operability of the fire protection design features presently covered by these Technical Specifications, subject to the provisions of 10 CFR 50.59, as a result of the requested change to License Condition 2.K, which implements and maintains the approved fire protection program as described in the Updated Final Safety Analysis Report (UFSAR).

The fire protection program is currently described in the document entitled, "Indian Point Unit 2 Fire Protection Program Plan" (FPPP), which is referenced in the "Fire Protection Systems" section of the UFSAR. This document was initially submitted to the NRC on October 13, 1987, and periodic revisions have been submitted since then. Operability requirements and the actions to be taken in the event of the inoperability of fire protection

equipment currently addressed in the Technical Specifications are included in the FPPP. The periodic testing and inspection requirements of the fire protection design features contained in the Technical Specifications are also included in the FPPP and are performed in accordance with written procedures. Editorial changes and corrections to both sets of requirements will be made prior to implementation of the proposed Technical Specification changes. Further, a number of the surveillance intervals were changed to accommodate a 24-month fuel cycle (Generic Letter 91-04). The FPPP will also be updated to incorporate the changed frequencies prior to implementation.

B. Technical Specification 6.2.2, "Facility Staff", is revised to delete item "f" which identifies the requirements for a fire brigade. Maintenance of a fire brigade continues to be required as specified in the FPPP and the applicable Station Administrative Order(s).

C. Technical Specification 6.4, "Training", is revised to delete section 6.4.2 which requires a fire brigade training program. Training of the fire brigade continues to be required as specified in the FPPP and the applicable Station Administrative Order(s).

D. Technical Specification 6.9.2, "Special Reports", has been revised to delete item "b" which addresses reporting of the inoperability of fire protection and detection equipment. With the deletion of Technical Specification 3.13, the special reporting requirement of section 6.9.2 is no longer applicable. Appropriate reporting requirements are contained in the FPPP.

The deletion of these Technical Specifications would eliminate unnecessary redundancy in accordance with the goal of Technical Specification improvement initiatives as delineated in other NRC policy statements, and would simplify the administrative implementation of fire protection requirements at Indian Point Unit No. 2. Station procedures which cite these Technical Specification sections will be revised prior to implementation of the proposed change.

(2) <u>Addition of Technical Specification Sections</u>

A. Technical Specification 6.5.1.6.1 is added to require Station Nuclear Safety Committee review of the fire protection program and implementing procedures and the submittal of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.

B. Technical Specification 6.8.1.e is added to require written procedures and administrative policies for the fire protection program.

Both additions are consistent with the guidance provided in Generic Letter 88-12, and would provide administrative controls on the fire protection program that are comparable to those for other programs addressed in the Technical Specifications (Plant Security Plan, Emergency Plan) and also assure an equivalent level of protection. The fire protection program is currently implemented through a number of station procedures known as "Station Administrative Orders."

(3) License Condition 2.K currently addresses completion of modifications identified in the NRC SER dated January 31, 1979, and requires the implementation and maintenance of the administrative controls identified in the same SER. The proposed 2.K, consistent with the guidance provided in Generic Letters 86-10 and 88-12, requires the implementation and maintenance of the NRC-approved fire protection program as described in the UFSAR. Lastly, the change provision specified in Generic Letter 86-10 is included.

The change provision would permit changes that would not adversely affect the ability to achieve and maintain safe shutdown to be made to the NRC-approved fire protection program, including items required by NRC SERs, under the provisions of 10 CFR 50.59. In this context, the determination of the involvement of an unreviewed safety question defined in 10 CFR 50.59(a)(2) would be made based on the "accident...previously evaluated" as being the postulated fire in the fire hazards analysis for the fire zone or area affected by the change. Hence, the proposed License Condition establishes an adequate basis for defining the scope of changes to the fire protection program which can be made without prior Commission approval, i.e., without introduction of an unreviewed safety question.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has provided guidance concerning the application of the standards for determining whether a "Significant Hazards Consideration" exists by providing certain examples in 51 FR 7744 (dated March 6, 1986). Example (vii) of those involving no significant hazards considerations relates to "a change to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

In this case, NRC Generic Letters 86-10 and 88-12, although not regulations, provide pertinent guidance relative to the above described proposed changes and implementation of the NRC fire protection regulations of 10 CFR 50.48(a). Specifically, the generic letters allow licensees to delete fire protection related technical specifications, provided that administrative requirements are added to technical specifications and a license condition is provided that requires the implementation and maintenance in effect of the approved fire protection program. Further, the generic letters provide for inclusion of the fire protection program into the UFSAR and permits future changes to the fire protection program without prior NRC approval, all as provided by the license condition and in accordance with the provisions of 10 CFR 50.59. Therefore, since the actions required by the generic letters have been taken and conform the license to the current interpretation of NRC fire protection regulations as described in Generic Letters 86-10 and 88-12, with no changes to facility operations, these proposed changes are in accordance with Example (vii) above.

In accordance with the requirements of 10 CFR 50.92, the proposed changes to the Technical Specifications are deemed not to involve any "Significant Hazards Considerations" because operation of Indian Point Unit No. 2 in accordance with these changes would not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The fire protection program requirements are not affected in that the function, operation or surveillance requirements for any fire protection system or component are not being altered. The proposed changes simply relocate these requirements from the Technical Specifications to the UFSAR, are administrative in nature, and do not affect any other current plant equipment or practices. Therefore, the conclusions of current accident analyses are not affected. Further, as permitted by the proposed License Condition 2.K, changes in the NRC-approved fire protection program will require an evaluation per the criteria of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future changes to the fire protection program will be evaluated in accordance with appropriate criteria.

2) Create the possibility for a new or different kind of accident from any previously evaluated.

   The proposed changes introduce no new mode of plant operation, do not involve physical modification to any structure, system or component, do not affect the function, operation or surveillance requirements for any equipment necessary for safe operation or shutdown of the plant or of fire protection equipment which protects such equipment, and do not involve any changes to setpoints or operating parameters. The changes are administrative only and all existing fire protection requirements are maintained. Therefore, the changes can not result in an unanalyzed accident. Further, as permitted by the proposed License Condition 2.K, changes in the NRC-approved fire protection program will require an evaluation per the criteria of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future changes to the fire protection program will be evaluated in accordance with appropriate criteria.

3) Involve a significant reduction in the margin of safety.

   The existing fire protection program operability and surveillance requirements are retained as they are contained in the FPPP, and compliance will continue through proposed License Condition 2.K. Therefore, no margins of safety established by design or verified by testing to ensure operability of fire protection systems or components are affected. Further, as permitted by the proposed License Condition 2.K, changes in the NRC-approved fire protection program will require an evaluation per the criteria of 10 CFR 50.59 to determine that the proposed change will not involve an unreviewed safety question. Therefore, future changes to the fire protection program will be evaluated in accordance with appropriate criteria.

Based on the above discussion, since these proposed changes to the Indian Point Unit No. 2 Technical Specifications satisfy the criteria specified in 10 CFR 50.92, are similar to an example provided by the Commission of a change which involves "No Significant Hazards Considerations", and are not similar to any examples that involve a "Significant Hazards Consideration", Con Edison has determined that this amendment application does not involve any "Significant Hazards Considerations".

The proposed Technical Specification changes have been reviewed by the Station Nuclear Safety Committee and the Con Edison Nuclear Facilities Safety Committee. Both committees concur that these proposed changes do not represent any "Significant Hazards Considerations".

ATTACHMENT D

"FIRE PROTECTION SYSTEM"

UPDATED FINAL SAFETY ANALYSIS REPORT, SECTION 9.6.2

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

9.6.1.3 Design Evaluation

The nonessential portion of the service water system is not required for the maintenance of plant safety immediately following an accident. The essential portion of the service water system is designed to provide cooling water in the event of a single failure of any active component used during the injection phase of the safety injection system (Section 6.2).

Sufficient pump capacity is included to provide design service water flow under all conditions and the headers are arranged in such a way that even loss of a complete header does not jeopardize plant safety.

9.6.1.4 Tests and Inspections

Each service water pump underwent a hydrostatic test in the shop in which all wetted parts were subjected to a hydrostatic pressure of one-and-one-half times the shutoff head of the pump. In addition, the normal capacity versus head tests were made on each pump.

Valves in the portions of the service water system essential to safety underwent a shop hydrostatic test of 250 psi on the body and 175 psi on the seat. The service water system design pressure is 150 psig.

All service water piping was hydrostatically tested in the field at 225 psig or one-and-one-half times design. The welds in shop-fabricated service water piping were liquid penetrant or magnetic particle inspected in accor dance with the ASME Boiler and Pressure Vessel Code, Section VIII.

Electrical components of the service water system are tested periodically.

9.6.2 FIRE PROTECTION SYSTEM | 5

Criterion: Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions. Noncombustible and heat resistant materials shall be used wherever practical throughout the unit, particularly in locations such as the containment and the control room. Fire detection and protection systems of appropriate capacity and capability shall be provided and designed to minimize the adverse effects of fires on structures, systems, and com-

ponents important to safety. Fire fighting systems shall be designed to assure that their rupture or inadvertent operation does not significantly impair the safety capability of these structures, systems, and components. (GDC 3, Appendix A to 10 CFR 50)

This criterion (GDC 3, 10 CFR 50 Appendix A) represents a revised design basis for the Indian Point Unit 2 fire protection system as was established for the original plant design and initial license application. In 1976 at the request of the NRC, Con Edison initiated a review and evaluation of the station fire protection system to this new criterion; modifications were subsequently proposed by Con Edison to the overall fire protection program. On January 31, 1979, the NRC approved the Indian Point Unit 2 overall fire protection program as providing additional assurance that safe shutdown can be accomplished and that the plant can be maintained in a safe condition during and following potential fire situations. This NRC approval was made as Amendment No. 46 to the facility operating license.

Additional fire protection regulations were issued in 10 CFR 50.48 and Appendix R to Part 50 on November 19, 1980, with an effective date of February 17, 1981. These regulations established requirements for utilities to implement a fire protection program, and backfitted certain requirements in Appendix R to all utilities. For Con Edison, these included the various separation and protection requirements contained within Section III.G, emergency lighting requirements as stipulated by III.J, and oil collection system requirements for reactor coolant pumps as contained in Section III.O. Additionally, Section III.L established performance requirements for alternative shutdown systems. Subsequent to the regulations established in 10 CFR 50.48, various NRC generic letters and guidance documents have been issued to provide clarification of the Appendix R requirements. | 5

Con Edison initiated reviews and evaluations of the station fire protection program and systems to demonstrate conformance with the appropriate Appendix R requirements and guidance documents. A description of these reviews, the results and subsequent NRC approvals are contained in the document under separate cover entitled "Indian Point Unit 2 Fire Protection Program Plan." This document also contains a complete description of the station fire protection program including the definition of fire areas and barriers, descriptions of fire detection and protection systems, and the description | 5
and operation of the alternate safe shutdown system. |10