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August 5, 1994

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Proposed Changes in Technical Specification
Surveillance Intervals to Accommodate a 24 Month
Fuel Cycle

Transmitted herewith are the original and two (2) copies of an "Application for Amendment to the Operating License". This application requests an amendment to the Con Edison, Indian Point Unit No. 2, Technical Specifications. In accordance with 10 CFR 50.91, a copy of this specification and the associated attachments are being submitted to the designated New York State official.

This application for amendment to the Indian Point Unit No. 2 Technical Specifications supplements our submittal of May 29, 1992. In that submittal we indicated, by the designations "R" or "at least once every Refueling Interval", those Technical Specification surveillances which would be revised to reflect a 24 month fuel cycle. This submittal includes safety assessments which support revision of portions of the Technical Specification surveillance intervals. These Technical Specification surveillance intervals are highlighted by a # sign to distinguish them from refueling surveillance intervals which remain at 18 months.

Also included in this submittal are the results of an internal audit of all the effort performed to revise the Technical Specification surveillances to accommodate a 24 month fuel cycle. This audit revealed discrepancies which are reconciled as follows:

- 1) The May 29, 1992 submittal contained a Technical Specification page which was revised to reflect a 24 month surveillance cycle for charging flow instrumentation (Table 4.1-1, Item 12). Our review, however, determined that the documentation submitted for this item on May 29, 1992 and November 25, 1992 was incomplete. Accordingly, the entire documentation for this item, rewritten in the revised format of our August 27, 1993 letter, is being resubmitted.

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- 2) The May 29, 1992 submittal contained a Technical Specification page revision which revised the surveillance interval to 24 months (+25%) for the continuous level instrumentation for the Containment Sump. The current submittal contains the remaining safety assessments for the Recirculation Sump and Reactor Cavity (Table 4.1-1, Item 21b.) The entire item 21b. is being resubmitted to provide an updated documentation package consistent with the revised format presented in our letter of August 27, 1993.

This submittal is the seventh in a series of submittals intended to revise Technical Specification 18 month surveillance intervals in accordance with Generic Letter 91-04. The proposed changes are indicated by vertical lines in the right margin of the proposed Technical Specification pages enclosed.

We confirm with respect to the changes proposed herein that the assumptions in the plant licensing basis will not be invalidated on the basis of performing any surveillance at the proposed bounding surveillance interval.

In addition, this Technical Specification amendment has been reviewed and accepted by the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC).

Should there be any questions with regard to this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

Thomas Schuessler

cc: Mr. Thomas T. Martin
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