ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

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

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Table 3.5-2

Reactor Trip Instrumentation Limiting Operating Conditions

No.	Functional Unit	1 No. of Channels	2 No. of Channels to Trip	3 Min. Operable Channels	4 Min. Degree of Redundancy	5 Operator Action if Conditions of Column 3 or 4 Cannot be Met
15.	DELETED					
16.	Control Rod Protection****	3	2	2	1	During RCS cooldown, manually open reactor trip breakers prior to T_{cold} decreasing below 350°F. Maintain reactor trip breakers open during RCS cooldown when T_{cold} is less than 350°F.
17.	Turbine Trip ≥ 35% F.P. A. Low Auto Stop Oil Pressure	3	2	2	1	Maintain reactor power below 35% F.P.
18.	Reactor Trip Logic	2	1	2#	1#	Be in hot shutdown within the next six hours.
18.a	Engineered Safety Features (SI) Logic	2	1	2##	1##	Be in hot shutdown within the next six hours.

Amendment No.

Table 3.5-2

Reactor Trip Instrumentation Limiting Operating Conditions

F.P. = Rated Power

* If two of four power range channels are greater than 10% F.P., channels are not required.

** If one of two intermediate range channels is greater than 10^{-10} amps, channels are not required.

*** 2/4 trips all four reactor coolant pumps.

**** Required only when control rods are positioned in core locations containing LOPAR fuel.

\# A reactor trip breaker and/or associated logic channel may be bypassed for maintenance or surveillance testing for up to eight hours provided the redundant reactor trip breaker and/or associated logic channel is operable.

\#\# An Engineered Safety Feature (SI) logic channel may be bypassed for maintenance or surveillance testing for up to eight hours provided the redundant logic channel is operable.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels

	Channel Description	Check	Calibrate	Test	Remarks
20.	Boric Acid Make-up Flow Channel	N.A.	R	N.A.	
21a.	Containment Sump and Recirculation Sump Level (Discrete)	S	R#	R#	Discrete Level Indication Systems.
21b.	Containment Sump, Recirculation Sump and Reactor Cavity Level (Continuous)	S	R#	R#	Continuous Level Indication Systems.
21c.	Reactor Cavity Level Alarm	N.A.	R#	R#	Level Alarm System
21d.	Containment Sump Discharge Flow	S	R	M	Flow Monitor
21e.	Containment Fan Cooler Condensate Flow	S	R#	M*	
22a.	Accumulator Level	S	R#	N.A.	
22b.	Accumulator Pressure	S	R#	N.A.	
23.	Steam Line Pressure	S	R#	Q	
24.	Turbine First Stage Pressure	S	R#	Q	
25.	Reactor Trip Logic Channel Testing	N.A.	N.A.	M[1]	
26.	Engineered Safety Features (SI) Logic Channel Testing	N.A.	N.A.	M[1]	

* Monthly visual inspection of condensate weirs only.

2. Liquid Effluent Instrumentation

a. The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.9-1 shall be operable with their alarm/trip setpoints set to ensure that the limits of Specification 3.9.A.1.a are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM).

b. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

c. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels operable, take the action shown in Table 3.9-1. Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

3. Liquid Effluent Dose

a. The dose or dose commitment to a member of the public from radioactive materials in liquid effluents released from each reactor unit to unrestricted areas (see Figure 5.1-1) shall be limited:

(i) during any calendar quarter to less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ, and

(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 Annual 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

(ii) for iodine-131, for tritium and for all radionuclides in particulate form with half lives greater than 8 days: less than or equal to 1500 mrem/yr to any organ.

b. With the dose rate(s) exceeding the above limits, without delay restore the release rate to within the above limit(s).

2. Gaseous Effluent Instrumentation

a. The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.9-2 shall be operable with their alarm/trip setpoints set to ensure that the limits of Specification 3.9.B.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

b. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

c. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels operable, take the action shown in Table 3.9-2. Exert best efforts to return the instruments to operable status within 30 days and, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

4.2 INSERVICE INSPECTION AND TESTING

Applicability

Applies to the inservice inspection of Quality Group* A, B, and C components and the inservice testing of pumps and valves whose function is required for safety.

Objective

To provide assurance of the continued integrity and/or operability of those structures, systems, and components to which this specification is applicable.

Specifications

4.2.1 Inservice Testing

Inservice testing of pumps and valves whose function is required for safety shall be performed in accordance with the applicable edition and addenda of Section XI of the ASME Boiler and Pressure Vessel Code as required by 10 CFR 50, Section 50.55a(g), except where specific written relief pursuant to 10 CFR 50, Section 50.55a has been granted.

4.2.2 Inservice Inspection

Inservice inspection of Quality Group* A, B, and C components shall be performed in accordance with the applicable edition and addenda of Section XI of the ASME Boiler and Pressure Vessel Code as Required by 10 CFR 50, Section 50.55a(g), except where specific written relief pursuant to 10 CFR 50, Section 50.55a has been granted.

* Quality Group classification is in accordance with Revision 3 of Regulatory Guide 1.26.

monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.6, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

B. LAND USE CENSUS

1. A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location, in each of the 16 meteorological sectors, of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m^2 (500 ft^2) producing broad leaf vegetation. (For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the land use census shall also identify within a distance of 5 km (3 miles) the locations, in each of the 16 meteorological sectors, of all milk animals and all gardens of greater than 50 m^2 producing broad leaf vegetation.)

2. The land use census shall be conducted during the growing seasons at least once per calendar year using that information which will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.5.

3. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.10.B.4, in lieu of a Licensee Event Report,

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* Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the site boundary in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 4.11-1.4c shall be followed, including analysis of control samples.

identify the new location(s) in the next Annual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.6.

4. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) a factor of 2 greater than at a location from which samples are currently being obtained in accordance with Specification 4.11.A, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after (October 31) of the year in which this land use census was conducted. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.6, identify the new location(s) in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

C. INTERLABORATORY COMPARISON PROGRAM

1. Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that has been approved by the Commission.

2. With analyses not being performed as required in Specification 4.11.C.1 above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.5.

3. The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.5.

Table 4.11-1

Radiological Environmental Monitoring Program

Table Notation

a The code letters in parenthesis, e.g. DR1, A1 define generic sample locations. Specific parameters of distance and direction sector from the centerline of one reactor, and additional description where pertinent, shall be provided for each and every sample location in Table 4.11-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants", October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.5. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances, suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the radiological environmental monitoring program. In lieu of a Licensee Event Report and pursuant to Specification 6.9.1.6, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

b One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation.

c The purpose of this sample is to obtain background information. If it is not practical to establish control locations in accordance with the distance and wind direction criteria, other sites that provide valid background data may be substituted.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President-Nuclear Power shall be responsible for overall facility activities and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Plant Manager shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.

b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

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 Plant Manager 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 Manager 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 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

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.

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 Plant 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 Manager 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.

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6.5 REVIEW AND AUDIT

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Function

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Composition

6.5.1.2 The Station Nuclear Safety Committee shall, as a minimum, be composed of technically competent individuals, approved by the Vice President-Nuclear Power, in the following disciplines:

Chairman:	Senior Manager *
Member:	Engineering
Member:	Operations
Member:	Maintenance
Member:	Instrument and Control
Member:	Radiation Protection
Member:	Reactor Engineering

* This senior manager shall be a technically competent person experienced in the field of nuclear energy, shall be appointed by and report directly to the Vice President-Nuclear Power for the SNSC function and shall be independent of the Plant Manager.

6.5.1.2.1 In addition, other technically competent individuals may be appointed by the SNSC Chairman to serve as SNSC members.

Alternates

6.5.1.3 Alternate members shall be appointed in writing by the SNSC Chairman to serve on a temporary basis, and must have qualifications similar to the member being replaced.

Meeting Frequency

6.5.1.4 The SNSC shall meet at least once per calendar month and as convened by the SNSC Chairman or his designated alternate.

Quorum

6.5.1.5 A quorum of the SNSC shall consist of the Chairman or his designated alternate and four members. No more than two alternate members shall be included in the quorum.

a. review of (1) all procedures required by Specification 6.8 and changes thereto, and (2) any other proposed procedures or changes thereto as determined by the General Manager-Technical Services to affect nuclear safety,

b. review of all proposed tests and experiments that affect nuclear safety,

c. review of all proposed changes to the Technical Specifications,

d. review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety,

e. investigation of all violations of the Technical Specifications and preparation and forwarding of a report covering evaluation and recommendations to prevent recurrence to the Vice President-Nuclear Power and to the Chairman of the Nuclear Facilities Safety Committee,

f. review of facility operations to detect potential nuclear safety hazards,

g. performance of special reviews and investigations and the issuance of reports thereon as required by the Chairman of the Nuclear Facilities Safety Committee,

h. review of any unplanned, radioactive release, including the preparation of reports covering evaluation, recommendations and 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

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

j. review of any unplanned, radioactive release, including the preparation of reports covering evaluation, recommendations and 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.

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 Plant Manager 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.

Table 6.2-1

Minimum Shift Crew Composition**

License Category	During Operations Involving Core Alterations	During Cold Shutdown or Refueling Periods	At All Other Times
Senior Operator License	2*	1	2***
Operator License	1	1	2
Non-Licensed	(As Required)	1	2
Watch Engineer	1	(None Required)	1

* Includes individual with SRO license supervising fuel movement as per Specification 6.2.2(e).

** Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

*** When the unit is in an operational mode other than cold shutdown or refueling, at least one Licensed Senior Reactor Operator must be in the Control Room at all times.

6.5.2 Nuclear Facilities Safety Committee (NFSC)

Function

6.5.2.1 The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in the areas of:

a. reactor operations
b. nuclear engineering
c. chemistry and radiochemistry
d. metallurgy and non-destructive testing
e. instrumentation and control
f. radiological safety
g. mechanical and electrical engineering
h. quality assurance practices
i. radiological environmental effects
j. other appropriate fields associated with the unique characteristics of the nuclear power plant

Composition

6.5.2.2 The Committee shall have a permanent voting membership of at least 5 persons of which a majority are independent of the Nuclear Power organization and shall include technically competent persons from departments of Consolidated Edison having a direct interest in nuclear plant design, construction, operation or in nuclear safety. In addition, persons from departments not having a direct interest in nuclear plant design, construction, operation or nuclear safety may serve as members of the Committee if experienced in the field of nuclear energy. The Chairman and Vice Chairman will be senior officials of the Company experienced in the field of nuclear energy.

The Chairman of the Nuclear Facilities Safety Committee, hereafter referred to as the Chairman, shall be appointed by the Executive Vice President, Central Operations.

The Vice Chairman shall be appointed by the Executive Vice President, Central Operations. In the absence of the Chairman, he will serve as Chairman.

The Secretary shall be appointed by the Chairman of the Committee.

Committee members from departments having a direct interest in nuclear plant design, construction and operation or in nuclear safety shall be designated by the Vice President of the Company, who is responsible for the functioning of the department subject to the approval of the Chairman. Committee members from other departments may be appointed by the Chairman with the concurrence of the Vice President of that department.

Alternates

6.5.2.3 Each permanent voting member, subject to the Chairman's approval, may appoint an alternate to serve in his absence. Committee records shall be maintained showing each such current designation.

No more than two alternates shall participate as voting members in NFSC activities at any one time.

Alternate members shall have voting rights.

Consultants

6.5.2.4 Consultants shall be utilized as determined by the NFSC Chairman.

Meeting Frequency

6.5.2.5 The NFSC shall meet at least once per calendar quarter or at more frequent intervals at the call of the Chairman or, in his absence, the Vice Chairman.

h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.

i. Reports and meeting minutes of the Station Nuclear Safety Committee.

j. Environmental surveillance program pertaining to radiological matters.

Audits

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NFSC. These audits shall encompass:

a. The conformance of facility operation to all provisions contained within the Radiological Technical Specifications (Appendix A) and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.

d. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.

e. The Facility Fire Protection Program and implementing procedures at least once per 24 months.

f. A fire protection and loss prevention inspection and audit shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm at least once per 12 months.

g. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at least once per 36 months.

h. The radiological environmental monitoring program and the results thereof at least once per 12 months.

i. The Offsite Dose Calculations Manual and implementing procedures at least once per 24 months.

j. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

l. Any other area of facility operation considered appropriate by the NFSC or the Executive Vice President, Central Operations.

Authority

6.5.2.9 The NFSC shall report to and advise the Executive Vice President, Central Operations on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

Records

6.5.2.10 Records of NFSC activities shall be prepared, approved and distributed as indicated below:

a. Minutes of each NFSC meeting shall be prepared, approved and forwarded to the Executive Vice President, Central Operations and to Senior Company Officers concerned with nuclear facilities within 30 days following each meeting.

b. Reports of reviews encompassed by Specifications 6.5.2.7 e, f, g and h above, shall be prepared, approved and forwarded to the Executive Vice President, Central Operations and to Senior Company Officers concerned with nuclear facilities within 30 days following completion of the review.

c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Senior Company Officers concerned with nuclear facilities and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.0 A Reportable Event is defined as any of the conditions specified in 10 CFR 50.73a(2).

6.6.1 The following actions shall be taken in the event of a Reportable Event:

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.

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 Plant Manager or appropriate Department 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.

6.8.3 A mechanism shall exist for making temporary changes and they shall only be made by approved management personnel in accordance with the requirements of ANSI 18.7-1972. The change shall be documented, and reviewed by the SNSC and approved by the Plant Manager or appropriate Department Manager within 14 days of implementation.

6.8.4 The following programs shall be established, implemented, and maintained:

a. A program which will ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions. The program shall include the following:

(i) training of personnel,

(ii) procedures for sampling and analysis, and

(iii) provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

Routine Reports and Reportable Occurrences

6.9.1. In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator, Region I unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) amendments to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the appropriate tests identified in the UFSAR and shall include a description of the measured values of the operating conditions or

these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL RADIATION EXPOSURE REPORT[1]

6.9.1.3 Routine reports of occupational radiation exposure data during the previous calendar year shall be submitted no later than April 30 of each year.

6.9.1.4 The annual radiation exposure reports shall provide a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions[2], e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty

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1 A single submittal may be made for a multiple-unit station. The submittal should combine those sections that are common to all units at the station.

2 This tabulation supplements the requirements of 10 CFR Part 20.407.

ATTACHMENT II

SAFETY ASSESSMENT

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

November 3, 1994
Indian Point Unit No. 2

Description of Proposed Changes

1. Table of Contents Section 6.9: Remove the subsections from section 6.9 because this level of detail is not necessary.

2. TS Table 3.5-2 Page 3 of 5: Add item 18.a, Engineered Safety Features (SI) Logic, which specifies Engineered Safety Feature Logic operability requirements and Limiting Conditions for Operation (LCO) consistent with the requirements of the Reactor Trip Logic. Although TS Table 3.5-2 contains operability requirements for Reactor Trip Logic, there were no operability requirements in the table for Engineered Safety Feature Logic operability. This proposed amendment would add operability requirements and a LCO for Engineered Safety Feature Logic.

3. TS Table 3.5-2 Page 5 of 5: Add note specifying length of LCO for maintenance or testing of Engineered Safety Feature Logic Channel to be consistent with that for testing of the Reactor Trip Logic. TS Amendment No. 137 added a LCO for Reactor Trip Logic testing specifying how long a reactor trip breaker or its associated logic channel may be bypassed for maintenance or testing. This proposed amendment would add a similar LCO to allow maintenance or testing of Engineered Safety Feature Logic Channels.

4. TS Table 4.1-1: Add item 26, Engineered Safety Features Logic Channel Testing. This requirement was inadvertently deleted during TS Amendment No. 137. Technical Specification Amendment No. 137 changed Table 4.1-1 item 25 from "Logic Channel Testing" to "Reactor Trip Logic Channel Testing." This change inadvertently removed the Engineered Safety Features Logic Channel Testing requirement when the more general term "Logic Channel" was replaced with the more specific "Reactor Trip Logic Channel".

5. TS 3.9.A.2.c, 3.9.A.5.b, 3.9.B.2.c, 4.11.A.4, 4.11.B.3, 4.11.B.4 and Table 4.11-1: Change "Semiannual Radioactive Effluent Release Report" to "Radioactive Effluent Release Report." This change to the reporting requirements for the radioactive effluent release report from semiannual to annual was made in Technical Specification Amendment No. 172. These references to the radioactive effluent release report were inadvertently omitted.

6. TS 4.2.1: Update Reference cited from 10 CFR 50, Section 50.55a(g)(6)(i) to 10 CFR 50, Section 50.55a.

7. TS 4.2.2: Update Reference cited from 10 CFR 50, Section 50.55a(g)(6)(i) to 10 CFR 50, Section 50.55a.

8. TS Table 6.2-1: Revise Minimum Shift Crew Composition to reflect the requirements of 10 CFR 50.54. The current TS required minimum shift crew composition is not consistent with the requirements of 10 CFR 50.54. This change would update the Technical Specification requirements so that they conform to those specified in 10 CFR 50.54.

9. TS 6.1.2, 6.2.1.b, 6.3.2, 6.4.1, 6.4.2, and 6.5.1.7.c: Change "General Manager Nuclear Power Generation" to "Plant Manager" and "Nuclear Training Director" to "Nuclear Training Manager". These proposed changes are job title changes only and are the result of recent organizational changes at IP 2.

10. TS 6.4.1: Update Reference cited from Appendix A of 10 CFR Part 55 to 10 CFR Part 55.59. This change is necessary due to a revision of 10 CFR Part 55 which relocated the requirements of Appendix A of 10 CFR Part 55 to 10 CFR Part 55.59.

11. TS 6.5.1.2: Change "The Station Nuclear Safety Committee shall, as a minimum, be composed as follows:" to "The Station Nuclear Safety Committee shall, as a minimum, be composed of technically competent individuals, approved by the Vice President-Nuclear Power, in the following disciplines:". Consequently, the required SNSC composition is being revised to specify disciplines rather than specific job titles (i.e. change "Chief Plant Engineer" to "Engineering" and "Operations Manager" to "Operations"). Additionally, due to recent organizational changes, replace "Nuclear Power Generation Organization" with "Plant Manager" in the * note .

12. TS 6.5.1.6.h and TS 6.5.2.8.g: Delete these two sections and move the requirements to the Security Plan per recommendations contained in Generic Letter 93-07. Generic Letter 93-07, dated December 28, 1993, recommends that the emergency and security plans auditing requirements and implementing procedures be removed from the list of responsibilities of the company nuclear audit and review group. The Generic Letter states that 10 CFR Parts 50 and 73 include sufficient provisions to address these requirements. The letter also allows TS changes to remove the review of emergency and security plans and procedure and procedure changes for the implementation of the emergency and security plans from the list of responsibilities of the unit review group. The proposed TS amendment would remove the security plan audit and security procedure and procedure change review from the Technical Specifications.

13. TS 6.5.1.6.i and TS 6.5.2.8.f: Delete these two sections and move the requirements to the Emergency Plan per recommendations contained in Generic Letter 93-07. Generic Letter 93-07, dated December 28, 1993, recommends that the emergency and security plans auditing requirements and implementing procedures be removed from the list of responsibilities of the company nuclear audit and review group. The Generic Letter states that 10 CFR Parts 50 and 73 included provisions that are sufficient to address these requirements. The letter also allows TS changes to remove the review of emergency and security plans and procedure and procedure changes for the implementation of the emergency and security plans from the list of responsibilities of the unit review group. The proposed TS amendment would remove the emergency plan audit and emergency procedure and procedure change review from the Technical Specifications.

14. TS 6.5.2.1.h: Remove "Administrative controls" as an area requiring independent review and audit by the NFSC. TS Amendment No. 164 removed the requirement for NFSC concurrence with administrative control procedures. The removal of the administrative controls review and audit requirement was inadvertently omitted from that change. Additionally, this proposed change is consistent with the current Westinghouse Standard Technical Specifications (NUREG-1431).

15. TS 6.5.2.3: Change paragraph two from "No more than two alternates shall participate in activities at any one time." to "No more than two alternates shall participate as voting members in NFSC activities at any one time." This change is being proposed to clarify the intent of this statement.

16. TS 6.5.2.8.b: Remove radiological auditing requirements of the Environmental Technical Specifications. The radiological requirements were removed from the Environmental Technical Specifications in TS Amendment No. 90.

17. TS 6.5.2.10.a and TS 6.5.2.10.b: Change the time frame for the preparation of NFSC meeting minutes and reports of review/audit activities performed by NFSC from 14 to 30 days. This proposed change is consistent with the current Westinghouse Standard Technical Specifications (NUREG-1431). Furthermore, the change is administrative as it does not change the process by which NFSC minutes are approved. A copy of the NFSC minutes will be distributed to the NFSC members as well as the Executive Vice President, Central Operations within 30 days. The proposed changes to the record keeping requirements are being made to provide a more appropriate time frame for issuing records of NFSC activities. The role of the NFSC as an independent reviewer of safety and regulatory aspects of plant operations remains unchanged and NFSC activities will continue to be conducted in accordance with the provisions of ANSI N18.7.

18. TS 6.8.2 and 6.8.3: Change "General Manager" to "Plant Manager or appropriate Department Manager". These proposed changes are revisions to job titles only and are the result of recent organizational changes at IP 2.

19. TS 6.9.1.3: Change the required submittal date of the Annual Radiation Exposure Report from march 1 to April 30 to conform with the requirements of 10 CFR 20.2206(c).

Basis For No Significant Hazards Consideration Determination

The proposed changes do not involve a significant hazards consideration because:

1. **There is no significant increase in the probability or consequences of an accident previously evaluated.**
   The proposed amendments are administrative in nature. They involve making editorial changes, deleting portions of the Technical Specifications that have become unnecessary due to previously approved amendments, changing managerial titles, updating references and reporting requirements, revising the SNSC composition to specify disciplines rather than specific job titles, implementing changes referenced in Generic Letter 93-07, and revising

shift manning to conform with the requirements of 10 CFR 50.54. These changes do not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety Systems Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed changes to the subject Technical Specifications would not increase the probability or consequences of an accident previously evaluated.

2. **The possibility of a new or different kind of accident from any accident previously evaluated has not been created.**

   As stated above, the proposed changes are administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently, no new failure modes are introduced as a result of the proposed changes. Therefore, the proposed changes would not initiate any new or different kind of accident.

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

   The proposed changes are administrative in nature. Since there are no changes to the physical design or operation of the facility, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed changes would not result in a reduction in the margin of safety.

The proposed changes have been reviewed by both the Station Nuclear Safety Committee and the Con Edison Nuclear Facility Safety Committee. Both Committees concur that the proposed changes do not represent a significant hazards consideration.