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November 17, 1994

Re: Indian Point Unit 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

REFERENCE: Letter, S. Bram to Document Control Desk, dated August 5, 1994, Same Subject.

The referenced letter transmitted a request to amend the Technical Specification Surveillance interval for the Auxiliary Feedwater Flow Rate, Table 4.1-1, item #35. Subsequent review of the No Significant Hazards Determination has identified an inconsistency with the Description of Change. A corrected version is enclosed.

In addition, we are deleting the request to amend the Technical Specification surveillance interval for the RWST from the referenced submittal since it was already included in the previous submittal.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,

Stephen E. Quinn

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SAFETY ASSESSMENT

AUXILIARY FEEDWATER FLOW RATE CHANNEL

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

DESCRIPTION OF CHANGE

The current Indian Point Unit 2 Technical Specification governing the Auxiliary Feedwater Flow Rate, Table 4.1-1, item #35, requires a channel calibration/test be performed at every refueling outage. Currently, this surveillance is performed every 18 months (+25%). It is proposed that this surveillance frequency be revised to every 24 months (+25%). This change is being made in accordance with the guidance contained in Generic Letter 91-04.

All completed test procedures from the 1987 outage to the present were reviewed. This included any midcycle outage calibrations that may have resulted due to channel failures or modifications and the impact of Measurement and Test Equipment (M&TE) used to record the data. The "As Left/As Found" data from the completed test procedures was statistically evaluated to determine a projected 30 month drift value with a 95% probability at a 75% confidence level. This drift value was used as an input to determine the Channel Statistical Allowance (CSA) using the Westinghouse setpoint methodology. Included in the evaluation along with instrument drift is the determination of all other channel uncertainties including Sensor, Rack, M&TE, and Process Effects for normal environmental conditions. In addition to drift, a Primary Element Accuracy term addressing the accuracy of the flow nozzle along with sensor, rack and M&TE terms have been incorporated into the total uncertainty calculations.

There are no Technical Specification limits nor Safety Analysis limits which prohibit a 30 month surveillance cycle based upon the uncertainty thus determined.

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.

   It is proposed that the calibration frequency for the Auxiliary Feedwater Flow Rate channel be revised from 18 months (+25%) to 24 months (+25%).

   A statistical analysis of channel uncertainty for a 30 month operating cycle has been performed. Based upon this analysis it has been concluded that sufficient margin exists between the existing technical specification limits and the licensing basis Safety Analysis limit to accommodate the channel statistical error resulting from a 30 month operating cycle. The existing margin between the Technical Specification limit and the Safety Analysis limit provides assurance that plant protective actions will occur as required. It is therefore concluded that changing the surveillance interval from 18 months (+25%) to 24 months (+25%) will not result in 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.

The proposed change in operating cycle length due to an increased surveillance interval will not result in a channel statistical allowance which exceeds the current margin between the existing Technical Specification limit and the Safety Analysis limit. Plant equipment, which will be set at (or more conservatively than) Technical Specification limits, will provide protective functions to assure that safety analysis limits are not exceeded. This will prevent the possibility of a new of different kind of accident from any previously evaluated from occurring.

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

The above change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the margin which exists between the current Technical Specification limit and the licensing basis Safety Analysis limit. This margin, which is equivalent to the existing margin, is necessary to assure that protective safety functions will occur so that Safety Analysis limits are not exceeded.