

Mr. A. Alan Blind
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, NY 10511

October 2, 1999

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - ISSUANCE OF
EXIGENT AMENDMENT RE: ALLOWING ONE-TIME EXTENSION OF
SURVEILLANCE INTERVALS (TAC NO. MA5302)

Dear Mr. Blind:

The Commission has issued the enclosed Amendment No. 205 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2. The amendment consists of changes to the Technical Specifications (TSs) in response to your application transmitted by letter dated April 21, 1999, as supplemented October 15, 1999.

The amendment allows for a one-time extension of the reactor protection system and engineered safety features actuation system instruments.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY:

Jefferey F. Harold, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No. 205 to DPR-26
2. Safety Evaluation

cc w/encls: See next page

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DATE	10/29/99		10/29/99	10/29/99	10/28/99	10/ /99

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DATED: October 29, 1999

AMENDMENT NO. 205 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT
UNIT 2

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G. Hill (2), T-5 C3

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ACRS

R. Scholl (e-mail SE only to RFS)

J. Rogge, Region I

cc: Plant Service list

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NAME	JHarold/ <i>JFH</i>		SLitt <i>SL</i>	S Peterson	RBachmann		
DATE	10/29/99		10/29/99	10/29/99	10/28/99	10/	/99

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 29, 1999

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Vice President, Nuclear Power
Consolidated Edison Company
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The amendment allows for a one-time extension of the reactor protection system and engineered safety features actuation system instruments.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, reading "Jefferey F. Harold", is written over the typed name.

Jefferey F. Harold, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosures: 1. Amendment No 205 to DPR-26
2. Safety Evaluation

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Units 1/2**

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Albany, NY 12223**

DATED: October 29, 1999

AMENDMENT NO. 205 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT
UNIT 2

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 205
License No. DPR-26

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) dated April 21, 1999, as supplemented October 15, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-26 is hereby amended to read as follows:

99340006

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.205, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Sheri Peterson, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 29, 1999

ATTACHMENT TO LICENSE AMENDMENT NO.

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

Table 4.1-1 (Page 1 of 7)
Table 4.1-1 (Page 2 of 7)
Table 4.1-1 (Page 3 of 7)
Table 4.1-1 (Page 4 of 7)
Table 4.1-1 (Page 5 of 7)
Table 4.1-1 (Page 6 of 7)
Table 4.1-1 (Page 7 of 7)

Insert Pages

Table 4.1-1 (Page 1 of 8)
Table 4.1-1 (Page 2 of 8)
Table 4.1-1 (Page 3 of 8)
Table 4.1-1 (Page 4 of 8)
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Table 4.1-1 (Page 7 of 8)
Table 4.1-1 (Page 8 of 8)

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
1. Nuclear Power Range	S	D (1) M (3)*1	Q (2)	1) Heat balance calibration 2) Signal to delta T; bistable action (permissive, rod stop, trips) 3) Upper and lower chambers for axial offset.
2. Nuclear Intermediate Range	S (1)	N.A.	S/U (2)*2	1) Once/shift when in service 2) Bistable action (permissive, rod stop, trip)
3. Nuclear Source Range	S (1)	N.A.	S/U (2)*2	1) Once/shift when in service 2) Bistable action (alarm, trip)
4. Reactor Coolant Temperature	S	R#	Q (1)	Calibration of setpoint generators extended on a one time basis to 37 months 1) Overtemperature - delta T Overpower - delta T
5. Reactor Coolant Flow	S	R#	Q	Calibration of transmitters extended on a one time basis to 37 months.
6. Pressurizer Water Level	S	R#	Q	Calibration of transmitters extended on a one time basis to 37 months.
7. Pressurizer Pressure (High & Low)	S	R#	Q	Calibration of transmitters extended on a one time basis to 37 months.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
8. 6.9 kV Voltage & Frequency	N.A.	R##	Q	Reactor Protection circuits only
9. Analog Rod Position	S	R#	M	
10. Rod Position Bank Counters	S	N.A.	N.A.	With analog rod position
11. Steam Generator Level	S	R#	Q	Calibration of transmitters extended on a one time basis to 37 months.
12. Charging Flow	N.A.	R#	N.A.	
13. Residual Heat Removal Pump Flow	N.A.	R##	N.A.	Calibration of transmitters extended on a one time basis to 37 months.
14. Boric Acid Tank Level	W	R#	N.A.	Bubbler tube rodded during calibration
15. Refueling Water Storage Tank Level	W	Q	N.A.	
16. DELETED				
17. Volume Control Tank Level	N.A.	R##	N.A.	
18a. Containment Pressure	D	R#	Q	Wide Range
18b. Containment Pressure	S	R#	Q	Narrow Range.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
18c. Containment Pressure (PT-3300,PT-3301)	M	R#	N.A.	High Range
19. Process Radiation Monitoring System	D	R#	M	
19a. Area Radiation Monitoring System	D	R#	M	
19b. Area Radiation Monitoring System (VC)	D	R#	M	
20. Boric Acid Make-up Flow Channel	N.A.	R#	N.A.	
21a. Containment Sump and Recir- culation Sump Level (Discrete)	S	R##	R##	Discrete Level Indication Systems.
21b. Containment Sump, Recircu- lation Sump and Reactor Cavity Level (Continuous)	S	R#	R#	Continuous Level Indication Systems. Calibration of transmitters extended on a one time basis to 37 months. Testing of transmitters extended on a one time basis to 37 months.
21c. Reactor Cavity Level Alarm	N.A.	R#	R#	Level Alarm System
21d. Containment Sump Discharge Flow	S	R#	M	Flow Monitor

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
21e. Containment Fan Cooler Condensate Flow	S	R#	M*3	Calibration of transmitters extended on a one time basis to 37 months.
22a. Accumulator Level	S	R#	N.A.	Calibration of transmitters extended on a one time basis to 37 months.
22b. Accumulator Pressure	S	R#	N.A.	Calibration of transmitters extended on a one time basis to 37 months.
23. Steam Line Pressure	S	R#	Q	Calibration of transmitters extended on a one time basis to 37 months.
24. Turbine First Stage Pressure	S	R#	Q	
25. Reactor Trip Logic Channel Testing	N.A.	N.A.	M*9	
26. Engineered Safety Features (SI) Logic Channel Testing	N.A.	N.A.	M*9	
27. Turbine Trip a. Low Auto Stop Oil Pressure	N.A.	R##	N.A.	
28. Control Rod Protection (for use with LOPAR fuel)	N.A.	R#	*4	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
29. Loss of Power				
a. 480v Emergency Bus Undervoltage (Loss of Voltage)	N.A.	R##	R##	
b. 480v Emergency Bus Undervoltage (Degraded Voltage)	N.A.	R##	R##	
c. 480v Emergency Bus Undervoltage (Alarm)	N.A.	R##	M	
30. Auxiliary Feedwater				
a. Steam Generator Water Level (Low-Low)	S	R#	R#	Calibration and testing of transmitters extended on a one time basis to 37 months.
b. Low-Low Level AFWS Automatic Actuation Logic	N.A.	N.A.	M	Test one logic channel per month on an alternating basis.
c. Station Blackout (Undervoltage)	N.A.	R##	R##	
d. Trip of Main Feedwater Pumps	N.A.	N.A.	R#	
31. Reactor Coolant System Subcooling Margin Monitor	M	R#	N.A.	
32. PORV Position Indicator (Limit Switch)	M	R#	R#	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
33. PORV Block Valve Position Indicator (Limit Switch)	M*5	R#	R#	
34. Safety Valve Position Indicator (Acoustic Monitor)	M	R#	R##	
35. Auxiliary Feedwater Flow Rate	M	R#	R#	
36. PORV Actuation/ Reclosure Setpoints	N.A.	R##	N.A.	
37. Overpressure Protection System (OPS)	N.A.	R#	*6	Calibration of transmitters extended on a one time basis to 37 months.
38. Wide Range Plant Vent Noble Gas Effluent Monitor (R-27)	S	R#	N.A.	
39. Main Steam Line Radiation Monitor (R-28, R-29, R-30, R-31)	S	R#	N.A.	
40. High Range Containment Radiation Monitor (R-25, R-26)	S	R#*7	N.A.	
41. Containment Hydrogen Monitor	Q	Q*8	N.A.	

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Channel Description	Check	Calibrate	Test	Remarks
42. Manual Reactor Trip	N.A.	N.A.	R#	Includes: 1) Independent verification of reactor trip and bypass breakers undervoltage trip circuit operability up to and including matrix contacts of RT-11/RT-12 from both manual trip initiating devices, 2) independent verification of reactor trip and bypass breaker shunt trip circuit operability through trip actuating devices from both manual trip initiating devices.
43. Reactor Trip Breaker	N.A.	N.A.	M*9	Includes independent verification of undervoltage and shunt trip attachment operability.
44. Reactor Trip Bypass Breaker	N.A.	N.A.	M*9	Includes: 1) Automatic undervoltage trip, 2) Manual shunt trip from either the logic test panel or locally at the switchgear prior to placing breaker into service.
45. Service Water Inlet Temperature Monitoring Instrumentation	S	R#	A	The test shall take place prior to T.S. 3.3.F.5.b Applicability.

Table 4.1-1

Minimum Frequencies for Checks, Calibrations and
Tests of Instrument Channels

Footnotes:

- *1 By means of the movable incore detector system.
- *2 Prior to each reactor startup if not done previous week.
- *3 Monthly visual inspection of condensate weirs only.
- *4 Within 31 days prior to entering a condition in which the Control Rod Protection System is required to be operable unless the reactor trip breakers are manually opened during RCS cooldown prior to T_{cold} decreasing below 350°F and the breakers are maintained opened during RCS cooldown when T_{cold} is less than 350°F.
- *5 Except when block valve operator is deenergized.
- *6 Within 31 days prior to entering a condition in which OPS is required to be operable and at monthly intervals thereafter when OPS is required to be operable.
- *7 Acceptable criteria for calibration are provided in Table II.F-13 of NUREG-0737.
- *8 Calibration will be performed using calibration span gas.
- *9 Each train shall be tested at least every 62 days on a staggered test basis (i.e., one train per month).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 205 TO FACILITY OPERATING LICENSE NO. DPR-26

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

1.0 INTRODUCTION

By a letter dated April 21, 1999, supplemented October 15, 1999, the Consolidated Edison Company of New York, Inc., the licensee for the Indian Point Unit 2, requested NRC's approval to amend its Operating License DPR-26 by revising the Technical Specifications (TSs). The proposed TS revisions would allow a one-time extension of the surveillance test intervals (STIs) for certain instruments in the reactor protection system (RPS), the engineered safety features actuation system (ESFAS) and other safety-related systems. The October 15, 1999, letter provided clarifying information that did not change the initial proposed no significant hazards consideration.

2.0 BACKGROUND

In 1992, in accordance with NRC Generic Letter 91-04, the licensee implemented a TS revision extending the STIs of safety-related instrument channels from 18 months to 24 months (not to exceed 30 months). In this submittal, the licensee proposed to extend the STIs for a few selected instruments of safety-related instrument channels to a total of 37 months on a one-time basis. This one-time STI extension is sought only for instruments which during normal power operation, either are not accessible (such as transmitters) or cannot be calibrated or tested. The remaining instruments of these instrument channels will be calibrated and/or tested regularly according to the TS schedule while the plant is in normal power operation.

According to the submittal, the STI extension for an additional 7 months is needed because after the previous refueling outage of June 1997, an additional maintenance-outage in 1998 has protracted the core operating cycle so that the next regular refueling outage is now scheduled for no later than June 3, 2000. This will make the interval between consecutive refueling outages more than the allowed 30 months. The licensee further stated that without the proposed extension, an unnecessary outage would be required to perform the surveillance of these few instruments.

3.0 PROPOSED CHANGE AND EVALUATION

Proposed changes to the current TS: On a one-time basis, extend the STI for the instruments of the following TS functions to a maximum of 37 months:

993240007

- A. TS Section 4.1, Table 4.1-1, Item 5, surveillance number PC-R2-1, Reactor Coolant Flow Transmitters.
- B. TS Section 4.1, Table 4.1 -1, Item 21 a, surveillance number PT-R2A, Containment Sump Level (Discrete), and surveillance number PT-R2B, Recirculation Sump Level (Discrete) Instrumentation.
- C. TS Section 4.1, Table 4.1-1, Item 6, surveillance number PC-R3-1, Pressurizer Level Transmitters.
- D. TS Section 4.1, Table 4.1-1, Items 29a, 29b, 29c and 30c, surveillance number PT-R61, 480 Volts Undervoltage and Degraded Voltage Relays.
- E. TS Section 4.1, Table 4.1-1, Item 8, surveillance number PC-R5A, 6.9kV Undervoltage Relays and PC-R5B-6.9kV Underfrequency Relays.
- F. TS Section 4.1, Table 4.1-1, Items 11, 30a, surveillance number PC-R7-1, Steam Generator Level Transmitters.
- G. TS Section 4.1, Table 4.1-1, Item 13, surveillance number PC-R9-1, RHR Flow Calibration Transmitters.
- H. TS Section 4.1, Table 4.1-1, Item 22a, surveillance number PC-R17A-1, Accumulator Level Transmitters
- I. TS Section 4.1, Table 4.1-1, Item 22b: surveillance number PC-R17B-1, Accumulator Pressure Transmitters.
- J. TS Section 4.1, Table 4.1-1, Item 23, surveillance number PC-R18-1, Steam Line Pressure Transmitters.
- K. TS Section 4.1, Table 4.1-1, Item 21 b, surveillance number PC-R21A-1, Containment Sump, surveillance number PC-R21 B-1, Recirculation Sump, surveillance number PC-R21C-1, Reactor Cavity Level (continuous), and surveillance number PC-R26-1, Containment Sump (continuous).
- L. TS Section 4.1, Table 4.1-1, Item 17, surveillance number PC-R13-1, Volume Control Tank Level Transmitters, surveillance number PC-R13, Volume Control Tank Level.
- M. TS Section 4.1, Table 4.1-1, and Item 21e, surveillance number PC-R36-1, Fan Cooler Unit Cooling Water Flow Transmitters.
- N. TS Section 4.1, Table 4.1-1, Items 36 and 37, surveillance number PC-R40-1, Over Pressure Protection System Pressure Transmitters (field), and surveillance number PT-R62, Pressurizer Pressure Operated Relief Valves.
- O. TS Section 4.1, Table 4.1-1, Item 7, surveillance number PC-R4-1, Pressurizer Pressure Transmitters.

- P. TS Section 4.1, Table 4.1-1, Item 4, surveillance number PC-EM37, OP/OT Δ T Setpoint Generator.

Evaluation

Instrument channel statistical-allowance (CSA) calculations factoring allowance for instrument drift are performed to support the RPS/ESFAS setpoints, setpoints for emergency operating procedures (EOPs), and safety analysis initial-condition assumptions. Since the instrument drift could be time dependent, the drift allowance assumed in CSA calculations could be affected by changes in STI, unless a drift assessment indicates that drift is independent of time. In their submittal, the licensee stated that they have performed an assessment for the instrument drift associated with the longer operating cycle of 37 months. This evaluation was performed employing the Westinghouse methodology, which was previously approved by the staff for licence amendments of the Indian Point Unit 3, and the Diablo Canyon Unit 2.

The licensee stated that using the Westinghouse methodology, the as-left/as-found calibration data for the affected instruments was organized and was converted to a percent span drift, which was further examined to identify and remove any data flawed by mechanistic causes (such as instrument failure, identifiable calibration anomalies, etc.). The sample data was then extrapolated to the population using descriptive statistics and tolerance factors, resulting in drift allowances at specified probability and confidence levels. For the 37-month operating cycle, the drift was established using a graded approach whereby the probability and confidence level of the drift was:

- 1) 95/95 for the RPS, ESFAS, and other critical functions used to establish initial conditions for the accident analysis,
- 2) 95/75 for functions used for EOPs or for important nuclear steam supply system (NSSS) control, and
- 3) 95/conservative engineering judgment for those functions selected in accordance with its safety significance.

The drift was further examined for time dependence, and in case drift was determined to be time dependent, a linear-regression method was used to adjust the drift allowance to yield a value applicable to 37 months. The calculated values of drift allowance were then applied to revise instrument CSA calculations.

The licensee stated that the results of the drift assessment indicated that the projected 37-month drift was bounded by the existing 30 months (24 months + 25%) drift or was otherwise accommodated by margins in the CSA calculations. Therefore, the existing instrument setpoints, TS safety analysis limits, and EOPs need not be changed. Because implementation of the proposed TS change would not change any existing instrument setpoints, TS safety analysis limits, or EOPs, the staff concludes that the proposed one-time extension to STI for the instruments listed above is acceptable.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

The licensee states that exigent circumstances pursuant to 10 CFR 50.91 exist with respect to the need for consideration of the proposed amendment. The proposed increase in the surveillance intervals is requested due to an outage during 1998 which extended the operating cycle of the core, therefore, the next refueling outage is now scheduled to commence in June 2000. Without the one-time extension, an otherwise unnecessary plant outage would be required to perform these surveillances.

Based on the above, the NRC staff has determined that the licensee has used best efforts to make a timely application and that exigent circumstances are present which warrant processing the requested amendment pursuant to 10 CFR 50.91(a)(6).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in a margin of safety.

The following evaluation, by the licensee and with which we agree, demonstrates that the proposed amendment does not involve a significant hazards consideration.

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendments:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?
- (A) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the RCS [reactor coolant system] flow channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift over a 37-month operating cycle has also been performed. The drift and bias thus calculated has been evaluated with regard to RCS flow CSA [channel statistical allowance] versus the Safety Analysis limits and it has been determined that the drift can be accommodated within the existing related Safety Analysis limits. It has also been determined that there is no general impact upon any Technical Specification requirements or the related Safety Analysis limits.

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (B) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. It has been concluded that there will be no impact upon any Technical Specification Requirement or Safety Analysis Limits. Of the surveillance anomalies identified since 1986, only one impacted an instrument channel. In this instance, level indication continued to be maintained due to redundancy. As added assurance, the current Indian Point Unit 2 Technical Specifications require a channel check be performed every shift, providing a means to monitor the channels for gross failure.

The existing margin between the Technical Specification limits and the Safety Analysis limits remains unchanged and provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the channels will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (C) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift of the transmitter over a 37-month operating cycle has currently been performed. Subsequently, when drift of the remainder of the channel (calibrated at the Technical Specification frequency of 24 months) is combined with the drift and bias of the transmitter projected at 37 months, the sum is accommodated by the channel uncertainty calculations. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitter is calibrated at 37 months.

It can also be concluded that sufficient allowance exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical error resulting from a 37 month operating cycle (with a rack calibration at 24 months plus 25%).

The existing allowance between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. Thus, the Channel Statistical Allowance for 37 months can be accommodated without impacting the Licensing basis Safety Analysis.

It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (D) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the 480 volt under voltage and degraded voltage relay channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift over a 37-month operating cycle has also been performed. The drift thus calculated has been evaluated with regard to the original CSA and has been found to be bounded by the CSA value. In addition, the relay setpoints have been compared with the Safety Analysis limits and it has been determined that the drift and bias can be

accommodated within the existing related Safety Analysis limits. It has also been determined that there is no general impact upon any Technical Specification requirements or the related Safety Analysis limits.

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the 480 volt under voltage and degraded voltage relays will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (E) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the 6.9 kV under voltage and Under Frequency relay channels for a 30-month operating cycle was performed. Corresponding statistical evaluations of the projected drifts over a 37-month operating cycle has also been performed. It has been confirmed that the drifts for 37 months will be no greater than the drifts projected for 30 months. The drifts thus calculated have been evaluated with regard to under voltage and under frequency set points versus the Safety Analysis limits and it has been determined that the drift can be accommodated within the existing related Safety Analysis limits with no decrease in margin. It has also been determined that there is no general impact upon any Technical Specification requirements of the related Safety Analysis limits.

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the under voltage and under frequency relays will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (F) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift of the transmitters over a 37-month operating cycle has currently been performed. Subsequently, when drift of the remainder of the channel (calibrated at the Technical Specification frequency of 24 months) is combined with the drift and bias of the transmitter projected at 37 months, the sum does not exceed the original CSA at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitter is calibrated at 37 months. It has been demonstrated that sufficient allowance exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical error resulting from a 37 month operating cycle (with a rack calibration at 24 months plus 25%).

The existing allowance between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitters will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (G) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift of the transmitter over a 37-month operating cycle has currently been performed. Subsequently, when drift of the remainder of the channel (calibrated at the Technical Specification frequency of 24 months) is combined with the drift and bias of the transmitter projected at 37 months, the sum does not exceed the original projection at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitter is calibrated at 37 months.

The proposed change does not affect the existing Safety Analysis limit nor any Technical Specification limits. Plant equipment will function as before, in order to preserve Safety Analysis limits.

It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitters will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (H) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the accumulator level channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift over a 37-month operating cycle has also been performed. It has been confirmed that the drift, including bias, for 37 months will be bounded by the CSA originally calculated for 30 months. The drift thus calculated has been evaluated with regard to level setpoints, versus the Safety Analysis limits and it has been determined that the drift, including bias, can be accommodated within the existing related Safety Analysis limits. It has also been determined that there is no general impact upon any Technical Specification requirements or the related Safety Analysis limits.

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (I) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the accumulator pressure channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift over a 37-month operating cycle has also been performed. It has been confirmed that the drift for 37 months will be no greater than the drift projected for 30 months. The drift thus calculated has been evaluated with regard to accumulator pressure setpoints versus the Safety Analysis limits and it has been determined that the drift can be accommodated within the existing related Safety Analysis limits. It has also been determined that there is no general impact upon any Technical Specification requirements or the related Safety Analysis limits.

The accumulators are passive engineered safety features since gas forces injection and no external source of power or signal transmission is needed to obtain fast-acting, high-flow capability when injection is required. One accumulator is attached to each of the four cold legs of the reactor coolant system.

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (J) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the steam line pressure channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift over a 37-month operating cycle has also been performed. It has been confirmed that the drift for 37 months will be no greater than the drift projected for 30 months. The drift thus calculated has been evaluated with regard to steam line pressure setpoints versus the Safety Analysis limits and it has been determined that the drift can be accommodated within the existing related Safety Analysis limits. It has also been determined that there is no general impact upon any Technical Specification requirements or the related Safety Analysis limits. The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.
- (K) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift and bias of the transmitters over a 37-month operating cycle has currently been performed. Subsequently, when drift of the remainder of the channels (calibrated at the Technical Specification frequency of 24 months is combined with the drift and bias of the transmitters projected at 37 months, the sum does not exceed the original projections at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitters are calibrated at 37 months. The sump level indications are provided to the control room by both magnetic switch / float-type detectors (series of 5 lights provide discrete level indication) and differential pressure transmitter (continuous level indication) which encompasses redundancy and diversity associated with containment sump level monitoring.

The existing allowance between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. No change in these allowances has occurred due to the proposed revision in surveillance interval of the transmitters.

It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (L) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift of the channel over a 37-month operating cycle has currently been performed. It has been confirmed that the channel drift for a 37-month interval is bounded by the existing drift allowance used in the current uncertainty calculations. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle. There are no nominal setpoints within the Technical Specifications for the level of the Volume Control Tank nor are there any applicable Safety Analysis Limits. Thus, the Channel Statistical Allowance for 37 months can be accommodated without impacting the licensing basis Safety Analysis.

It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (M) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of uncertainties for the FCU [fan cooler unit] flow channels for a 30-month operating cycle was performed. A corresponding statistical evaluation of the projected drift of the transmitters over a 37-month operating cycle has also been performed. When drift of the remainder of the channel (calibrated at 24 months) is combined with the drift and bias of the transmitter at 37 months, the sum does not exceed the original projection at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37 month operating cycle providing the rack is calibrated at the 24 month (plus 25%) frequency and the transmitter is calibrated at 37 months. In addition, the flow controllers to the Fan Cooling Units have had their low flow setpoints raised to provide operators with earlier alarms associated with FCU system flow degradation.

It has been determined that there is no general impact upon any Technical Specification requirements or related Safety Analysis limits. The Indian Point Unit 2 Technical Specification does not specify a specific setpoint. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (N) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. Statistical analyses of OPS [over pressure protection] pressure and PORV [power operated relief valve] channel uncertainties for a 30 month operating cycle were previously performed.

A corresponding statistical evaluation of the projected drift of the OPS pressure transmitter over a 37-month operating cycle has currently been performed. It has been confirmed that when the transmitter drift for a 37-month interval is determined it is bounded by the existing drift allowance used in the uncertainty calculations.

Subsequently, when drift of the remainder of the channel (calibrated at the Technical Specification frequency of 24 months) is combined with the drift of the transmitter projected at 37 months, the sum does not exceed the original projection at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitter is calibrated at 37 months.

Similarly, a statistical evaluation of the projected drift of the PORV channel over a 37 month operating cycle has currently been performed. It has been confirmed that the channel drift for a 37-month interval is bounded by the existing drift allowance used in the current uncertainty calculations. Therefore, the channel uncertainty derived for thirty months is valid for a 37 month-operating cycle.

It can also be concluded that sufficient allowance exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical errors resulting from a 37 month operating cycle.

The existing allowance between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the OPS pressure transmitter and the PORV channels will not result in a significant increase in the probability or consequences of any accident previously evaluated.

- (O) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. A corresponding statistical evaluation of the projected drift of the transmitter over a 37-month operating cycle has currently been performed. Subsequently, when drift of the remainder of the channel (calibrated at the Technical Specification frequency of 24 months) is combined with the drift and bias of the transmitters projected at 37 months, the sum does not exceed the original projection at 30 months. Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle providing the rack is calibrated at the 24-month (plus 25%) frequency and the transmitter is calibrated at 37 months. It can also be concluded that sufficient allowance exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical error resulting from a 37 month operating cycle (with a rack calibration at 24 months plus 25%).

The existing allowance between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (P) The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. A statistical analysis of channel uncertainty for a 30 month operating cycle was previously performed. The OT[Delta]T/OP[Delta]T uncertainty calculations of record for Con Ed are derived from PC-

R1A, PC-R1B, and PT-Q52. Of these, the quarterly surveillance performed via PT-Q52 provides the governing uncertainty allowances because it performs a functional check of the complete channel from rack input through output (bistable) every 90 days. This includes the R/E converters, E/I converters, I/I converters, OT[Delta]T setpoint generators, OP[Delta]T setpoint generators, OP[Delta]T impulse lag modules, and the bistables. If a problem is detected in PT-Q52, other procedures (PC-R1A, PC-R1B, PT-VIIA) are invoked to perform thorough evaluation and recalibration, as necessary. Therefore, the rack drift allowance incorporated in the OT[Delta]T and OP[Delta]T setpoint calculations are based on the performance of PT-Q52. Thus, continued performance of PT-Q52 on a quarterly basis, even in conjunction with the one time extension of PC-EM37, provides assurance that all modules are performing correctly.

Therefore, the channel uncertainty derived for 30 months is valid for a 37-month operating cycle since the rack components are checked on a quarterly frequency. It can also be concluded that sufficient margin exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical error resulting from a 37 month operating cycle (with a rack calibration at 24 months plus 25%).

The existing margin between the Technical Specification limits and the Safety Analysis limits provides assurance that plant protective functions will occur as required. It is therefore concluded that changing the surveillance interval from 24 months (plus 25%) to 37 months for the transmitter will not result in a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?
- (A) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the reactor coolant system flow instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitters will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.
- (B) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The increased surveillance interval (one-time only) will not adversely affect the Containment sump level and Recirculation Sump Level instrumentation functions. Plant equipment, which will be

nominally 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 or different kind of accident from any previously evaluated from occurring.

- (C) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance, interval (one-time only) will not adversely affect the Pressurizer Level instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitters will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (D) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the 480 Volt under voltage or degraded voltage instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the relays will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (E) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The increased surveillance interval (one-time only) will not adversely affect the 6.9 kV Under Voltage and Under Frequency instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the relays will not result in a channel statistical allowance which reduces the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (F) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the steam generator level instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitter will not result in a channel statistical allowance which exceeds the current margin and therefore will not exceed the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.
- (G) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the RHR [Residual Heat Removal] Flow instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitter will not impact any Technical Specification limit or Safety Analysis limit. Plant protective functions will occur as designed.

This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

- (H) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the accumulator level instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the level transmitters will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.
- (I) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance

interval (one-time only) will not adversely affect the accumulator pressure instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitters will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (J) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the steam line pressure instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the relays will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (K) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The proposed change in operating cycle length due to an increased surveillance interval for the transmitters will not result in a channel statistical allowance which impacts the current margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (L) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. There are no nominal setpoints within the Technical Specifications for the level of the Volume Control Tank nor are there any applicable Safety Analysis Limits. Thus, the Channel Statistical Allowance for 37 months can be accommodated without impacting the licensing basis Safety Analysis.

Other Plant equipment, which will be nominally set at (or more conservatively than) Technical Specification limits, will continue to provide protective functions to assure that Safety Analysis limits are not exceeded. This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

- (M) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report.

The proposed change in surveillance interval for the transmitter will not result in any impact upon existing Technical Specifications or Safety Analysis. Therefore, plant equipment will continue to provide protective functions to assure that Safety Analysis limits are not exceeded.

This will prevent the possibility a new or different kind of accident from any previously evaluated from occurring.

- (N) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The increased surveillance interval (one-time only) will not adversely affect the PORV Actuation/Reclosure and Overpressure Protection System (OPS) instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval will not result in channel statistical allowance which exceeds current margins and therefore, the margins between existing Technical Specification limits and Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (O) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the Pressurizer Pressure channel instrumentation functions. The proposed change in operating cycle length due to an increased surveillance interval for the transmitter will not result in a channel statistical allowance which exceeds the current margin and therefore the margin between the existing Technical Specification limits and the Safety Analysis limits. Plant equipment, which will be nominally 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 or different kind of accident from any previously evaluated from occurring.

- (P) The proposed license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Updated Final Safety Analysis Report. The increased surveillance interval (one-time only) will not adversely affect the OP/OT [Delta]T instrumentation functions since these loop functions are checked on a quarterly basis under PT-Q52. The proposed change in operating cycle length due to an increased surveillance interval for the setpoint generators will not result in a channel statistical allowance which exceeds the current margin. It can also be concluded that sufficient margin exists between the existing Technical Specification limits and the licensing basis Safety Analysis limits to accommodate the channel statistical error resulting from a 37 month operating cycle (with a rack calibration at 24 months plus 25%).

This will prevent the possibility of a new or different kind of accident from any previously evaluated from occurring.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?
- (A) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitters by seven months does not involve a significant reduction in a margin of safety.
- (B) The proposed license amendment does not involve a significant reduction in a margin of safety. The surveillance anomalies noted did not render the level indication system non-operational. Therefore, based on the redundancy and the reliability of the system, extension of the surveillance interval for a maximum of seven months for these tests would have little affect on the reliability of the discrete level indication systems. The historical data supports the conclusion that the margin of safety will not be compromised by extending the interval between tests on a one-time basis to a maximum of 37 months. Based on past test results, the one-time extension of six months does not involve a significant reduction in a margin of safety.
- (C) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds any margin which exists between the current Technical Specification limit and the licensing basis Safety Analysis limit, protective functions will occur so that Safety Analysis limits are not exceeded. Thus, the Channel Statistical Allowance for 37 months can be accommodated without impacting the licensing basis Safety Analysis. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any

safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitters by six months does not involve a significant reduction in a margin of safety.

- (D) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of six months does not involve a significant reduction in a margin of safety.
- (E) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which impacts the margin which exists between the current Technical Specification limit and the licensing basis Safety Analysis limit, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of seven months does not involve a significant reduction in a margin of safety.
- (F) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitters by seven months does not involve a significant reduction in a margin of safety.
- (G) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which affects the margin between any current Technical Specification limit and any licensing basis Safety Analysis limit, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. In conclusion, based upon the recently completed 37 month drift value being less than the existing 24 month drift value, the one-time extension of the

surveillance interval for the transmitter for seven months does not involve a significant increase in a margin of safety.

- (H) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitter by seven months does not involve a significant reduction in a margin of safety.
- (I) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the margin existing between the current Technical Specification limit and the licensing basis Safety Analysis limit, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitter by seven months does not involve a significant reduction in a margin of safety.
- (J) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitter by six months does not involve a significant reduction in a margin of safety.
- (K) The proposed license amendment does not involve a significant reduction in a margin of safety. The change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which impacts any margin which exists between the current Technical Specification limits and the licensing basis Safety Analysis Limits. Therefore, protective functions will continue to occur unchanged so that Safety Analysis limits are not exceeded. There is no reduction in the margin between any existing Technical Specification limit and its related Safety Analysis limit. Therefore, the proposed change for a one-time extension of the calibration and test interval does not adversely affect the performance of any safety related system, component or structure and does result in increased severity of any of the accidents considered in the Updated Final Safety

Analysis Report. Based on past test results, the one-time extension of the surveillance frequency for the channel transmitters does not involve a significant reduction in a margin of safety.

- (L) The proposed license amendment does not involve a significant reduction in a margin of safety. The change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which impacts any Technical Specification limits nor any licensing basis Safety Analysis limit. Protective functions will continue to occur so that Safety Analysis limits are not exceeded. There are no nominal setpoints within the Technical Specifications for the level of the Volume Control Tank nor are there any applicable Safety Analysis Limits.

Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of seven months for calibration of the channel does not involve a significant reduction in a margin of safety.

- (M) The proposed license amendment does not involve a significant reduction in a margin of safety.

Because the change in surveillance interval resulting from an increased operating cycle will not impact the margin which exists between current Technical Specification limits and licensing basis Safety Analysis limits, protective functions will continue to occur so that Safety Analysis limits are not affected. In addition, the flow controllers to the Fan Cooling Units have had their low flow setpoints raised to provide operators with an earlier warning associated with FCU system flow degradation. Therefore, the proposed change for a one-time extension of the transmitter surveillance interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report.

- (N) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the change in surveillance interval resulting from an increased operating cycle will not result in a channel statistical allowance which exceeds the margin existing between the current Technical Specification limit and the licensing basis Safety Analysis limit, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the calibration intervals does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of seven months for the OPS transmitters and six months for PORV set point calibrations does not involve a significant reduction in a margin of safety.
- (O) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. Based on past test results, the one-time extension of the surveillance interval for the transmitters by seven months does not involve a significant reduction in a margin of safety.

- (P) The proposed license amendment does not involve a significant reduction in a margin of safety. Because the 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, protective functions will occur so that Safety Analysis limits are not exceeded. Therefore, the proposed change for a one-time extension of the test interval does not adversely affect the performance of any safety related system, component or structure and does not result in increased severity of any of the accidents considered in the Updated Final Safety Analysis Report. The OP/OT [Delta]T instrumentation loop functions are checked on a quarterly basis under PT-Q52. Based on past test results, the one-time extension of six months does not involve a significant reduction in a margin of safety.

6.0 CONCLUSION

The proposed amendment will allow a one-time extension of the STIs for the SRs; described in Section 3.0 above. The Westinghouse method used by the licensee to evaluate the impact of the proposed STI extension on instrument drift has been approved by the staff in the past. The proposed amendment does not make functional or physical changes to any equipment and does not adversely affect the plant's ALARA Program, Security and Fire Protection Program, Emergency Plan, Safety Evaluation Report (SER) or Updated SER conclusions and Overall Plant operations and environment. Also, the proposed amendment does not introduce any new failure modes nor does it involve a significant reduction in a margin of safety. Therefore, the staff approves the proposed one-time STI extension.

7.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

8.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 55777). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR

51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

9.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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