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December 22, 1999

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

SUBJECT: Supplementary Information in Support of Proposed Technical Specification Amendment to Licensing Basis to Implement Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) Relaxed Test Times and Completion Times in Accordance with WCAP-14333-P-A, Revision 1

Reference: Con Edison Letter dated May 5, 1999, James S. Baumstark to Document Control Desk, " Proposed Amendment to Licensing Basis to Implement Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) Relaxed Test Times and Completion Times in Accordance with WCAP-14333-P-A, Revision 1

By the referenced letter, we transmitted an Application for Amendment to the Operating License for the subject proposed Technical Specification changes.

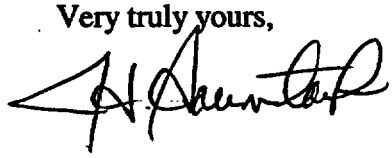
Pursuant to your request during a conference call on October 12, 1999, a Configuration Risk Management Program (CRMP) has been established for implementing the allowed outage time and test bypass time changes requested for Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) instrumentation analog channels, logic cabinets and master relays. The CRMP is being proceduralized by revising existing Operations Administrative Directive (OAD) 37. The new revision of OAD 37 meets the guidelines of Regulatory Guide 1.177. The new revision has been approved, and it will be implemented within 30 days of issuance of the requested amendment.

In response to subsequent discussions with your reviewer, proposed Technical Specification page 3.5-1, Section 3.5.3, Table 3.5-2, page 5 of 5, and Table 3.5-3, page 4 of 4 are being revised to add the word "corrective" preceding the word "maintenance." This is being done because in the

July 15, 1998 Safety Evaluation Report (SER) on WCAP-14333, "Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times", the staff did not approve the performance of routine or preventative maintenance with the analog channels, logic cabinets, or master relays bypassed. The SER approved the performance of corrective maintenance with the analog channels, logic cabinets and master relays bypassed within the proposed allowed outage times. Westinghouse, in WCAP-14333, had assumed that each analog channel, logic cabinet and master relay would be unavailable for the duration of one allowed outage time per year (72 hours for an analog channel and 24 hours for a logic cabinet or master relay) for maintenance in their evaluation. Since few component failures occur each year, the assumptions of WCAP-14333 provided the basis for allowing corrective maintenance with the analog channels, logic cabinets or master relays bypassed. Attachment I contains the revised proposed Technical Specification page 3.5-1.

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

Very truly yours,



Attachment

cc: Mr. Hubert J. Miller
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ATTACHMENT I

REVISED PROPOSED TECHNICAL SPECIFICATION PAGES

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
DECEMBER 1999

3.5 INSTRUMENTATION SYSTEMS

Operational Safety Instrumentation

Applicability

Applies to plant instrumentation systems.

Objectives

To provide for automatic initiation of the Engineered Safety Features in the event that principal process variable limits are exceeded, and to delineate the conditions of the plant instrumentation and safety circuits necessary to ensure reactor safety.

Specifications

3.5.1 When the plant is not in the cold shutdown condition, the Engineered Safety Features initiation instrumentation setting limits shall be as stated in Table 3.5-1.

3.5.2 For instrumentation channel, plant operation at rated power shall be permitted to continue in accordance with Tables 3.5-2 through 3.5-4. No more than one channel of a particular protection channel set shall be tested at the same time. By definition, an instrumentation channel failure shall not be regarded as a channel being tested.

3.5.3 In the event the number of channels of a particular function in service falls below the limits given in the column entitled Minimum Operable Channels, or Minimum Degree of Redundancy cannot be achieved, operation shall be limited according to the requirements shown in Column 5 or 6 of Tables 3.5-2 through 3.5-4. For on-line testing or corrective maintenance of instruments with installed bypass capability, the required minimum degree of redundancy may be reduced by one to permit testing or corrective maintenance of a channel in bypass.

3.5.4 In the event of sub-system instrumentation channel failure, Tables 3.5-2 through 3.5-4 need not be observed during the short period of time the operable sub-system channels are tested where the failed channel must be blocked to prevent unnecessary reactor trip.

3.5.5 The cover plate on the rear of the safeguards panel in the control room shall not be removed without authorization from the Watch Supervisor.

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 corrective maintenance for up to 24 hours or surveillance testing for up to eight hours provided the redundant reactor trip breaker and/or associated logic channel is operable.

(1) Restore all channels as required by column 1 to an OPERABLE status within 72 hours or place the inoperable channel in trip. Otherwise, maintain hot shutdown.

(2) Restore all channels as required by column 1 to an OPERABLE status within 72 hours or place the inoperable channel in trip. Otherwise, reduce reactor power below 35%.

Table 3.5-3

Instrumentation Operating Conditions for Engineered Safety Features

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An Engineered Safety Feature (SI) logic channel may be bypassed for corrective maintenance for up to 24 hours or surveillance testing for up to eight hours provided the redundant logic channel is operable.

(1) Restore all channels as required by column 1 to an OPERABLE status within 72 hours or place the inoperable channel in trip. Otherwise, proceed to cold shutdown.

(2) Restore all channels as required by column 1 to an OPERABLE status within 72 hours or place the inoperable channel in trip. Otherwise, reduce T_{avg} to less than 350ºF.