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Vice President



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February 14, 2000

Re: Indian Point Unit Nos. 1 & 2
Docket Nos. 50-3 & 50-247

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

Subject: Proposed Environmental Technical Specification Amendment
Consisting Of An Administrative Change

Transmitted herewith is an "Application for Amendment to the Operating License," sworn on February 14, 2000. This application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit Nos. 1 and 2 Environmental Technical Specifications. In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

The proposed administrative change seeks to delete, in Section 5.4.1, the reference to and the discussions about Section 4.2, which no longer exists.

Attachment I to this letter provides the proposed changed page, Attachment II provides the proposed change as a markup on the existing Environmental Technical Specification page, and Attachment III provides the Safety Assessment. It has been determined that the administrative change set forth herein does not represent a significant hazards consideration as defined by 10 CFR 50.92(c).

A001

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

Very truly yours,

Robert E. Minns
for A. Blund

Attachments

cc: Mr. Hubert J. Miller
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSOLIDATED EDISON COMPANY)
OF NEW YORK, INC.)
(Indian Point Station, Unit Nos. 1 and 2))

Docket No. 50-3 and 50-247

APPLICATION FOR AMENDMENT
TO OPERATING LICENSES

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Facility Operating License Nos. DPR-5 and DPR-26, hereby applies for amendment of the Environmental Technical Specifications contained in Appendix B of these licenses.

This Application for amendment to the Indian Point 1 and 2 Environmental Technical Specifications seeks to propose administrative change to delete, in Section 5.4.1, the reference to and the discussions about Section 4.2, which no longer exists.

The specific proposed Environmental Technical Specification Revision is set forth in Attachment I to this Application. A mark-up of the existing Technical Specification is provided in Attachment II. A Safety Assessment of the proposed change is set forth in Attachment III to this Application. This assessment demonstrates that the proposed change does not represent a significant hazards consideration as defined in 10 CFR 50.92(c).

As required by 10 CFR 50.91(b)(1), a copy of this Application and our analysis concluding that the proposed change does not constitute a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY:



A. Alan Blind

Vice President - Nuclear Power

Subscribed and sworn to
before me this 14th day
February, 2000.


Notary Public

ELIZABETH A. MELANSON
Notary Public, State of New York
No. 01ME4876094
Qualified in Orange County
Commission Expires Feb. 9, 2001

ATTACHMENT I

PROPOSED ENVIRONMENTAL TECHNICAL SPECIFICATION CHANGES

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NOS. 1 AND 2
DOCKET NOS. 50-3 AND 50-247
FEBRUARY 2000**

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Protection Plan Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The Annual Environmental Protection Plan Report shall include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with subsection 5.4.2.
- (d) A list of all reports submitted in accordance with the SPDES permit.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon possible in a supplementary report.

ATTACHMENT II

PROPOSED ENVIRONMENTAL TECHNICAL SPECIFICATION MARKED-UP PAGE

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NOS. 1 AND 2
DOCKET NOS. 50-3 AND 50-247
FEBRUARY 2000**

On this marked-up page from the current Environmental Tech Specs:

Deletions are shown by ~~double-strikethrough~~.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Protection Plan Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

~~The report shall include summaries and analyses of the results of the environmental protection activities required by subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with the preoperational studies, operational controls (as appropriate), and previous non radiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.~~

The Annual Environmental Protection Plan Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with subsection 5.4.2.
- (d) A list of all reports submitted in accordance with the SPDES permit.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon possible in a supplementary report.

ATTACHMENT III

SAFETY ASSESSMENT

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NOS. 1 AND 2
DOCKET NOS. 50-3 AND 50-247
FEBRUARY 2000**

SECTION I - Description of Change

The proposed administrative change seeks to delete, in Section 5.4.1, the reference to and the discussions about Section 4.2, which no longer exists.

SECTION II - Evaluation of Change

The reference section had been removed from the Environmental Technical Specifications in Amendment 90 to the Unit 2 Operating License. However, this reference and discussion to the deleted section was inadvertently overlooked.

This change is considered administrative since there is no change in the function, operation or physical configuration of the plant.

SECTION III - No Significant Hazards Evaluation

The proposed change does not involve a significant hazards consideration because:

- 1) Does the proposed license amendment involve a significant increase in the probability or in the consequences of an accident previously evaluated?

No. The proposed change is administrative in nature. The change involves deleting, in Section 5.4.1, the reference to and the discussions about Section 4.2, which no longer exists. The monitoring requirements specified in the current Environmental Technical Specifications remain unchanged. Therefore, the proposed changes would not involve a significant increase in the probability or in the consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

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

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

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

SECTION IV - Impact Of Changes

This change will not adversely impact the following:

- ALARA Program
- Security and Fire Protection Programs
- Emergency Plan
- UFSAR or SER Conclusions
- Overall Plant Operations and the Environment

The change involve deleting, in Section 5.4.1, the reference to and the discussions about Section 4.2, which no longer exists. This level of detail is not listed or implied in the UFSAR. Therefore, there is no UFSAR impact. There are no new failure modes introduced by this change. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected.

SECTION V - Conclusion

Therefore, the proposed change to the Environmental Technical Specifications does not involve a significant hazards consideration. In addition, the proposed change to the Environmental Technical Specifications has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.