

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

February 25, 2000

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - RE: ISSUANCE OF  
AMENDMENT ALLOWING RELOCATION OF ADMINISTRATIVE CONTROLS  
RELATED TO THE QUALITY ASSURANCE PROGRAM DESCRIPTION  
(TAC NO. MA5724)

Dear Mr. Blind:

The Commission has issued the enclosed Amendment No. 206 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 June 2, 1999, as supplemented by letter dated August 25, 1999.

The amendment allows for the relocation of the Quality Assurance related administrative controls to the Quality Assurance Program Description in accordance with NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

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,

/RA/

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. 206 to DPR-26  
2. Safety Evaluation

cc w/encls: See next page

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\*\* SE dated 9/13/99 was provided and no major changes were made

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 25, 2000

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cc w/encls: See next page

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Template NRR-056

DATED: February 25, 2000

AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. DPR-26-INDIAN POINT  
NUCLEAR GENERATING UNIT NO. 2

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2000 FEB 25 09:15 AM



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. 206  
License No. DPR-26

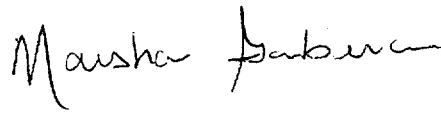
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) dated June 2, 1999, as supplemented August 25, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, 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:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 206 , 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



Marsha Gamberoni, Acting 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: February 25, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 206

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. Technical Specification Section 6.0 has been replaced in its entirety. All pages will be identified with an amendment number and the revised pages will contain marginal lines indicating the areas of change.

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Insert Pages

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- \* These pages were not affected by this amendment
- \*\* These pages were changed due to repagination

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

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

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

## 6.2.2 Facility Staff

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- e. All core alterations after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling. This individual shall have no other concurrent responsibilities during this operation.
- f. DELETED
- g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

- h. The Operations Manager shall hold a senior reactor operator license.

### 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 The Plant Manager shall meet or exceed the minimum qualifications specified for Plant Manager in ANSI N18.1-1971.

6.3.3 The Watch Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 DELETED

### 6.5 REVIEW AND AUDIT

6.5.1 The review and audit functions of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) are described in the Quality Assurance Program Description (QAPD).

### 6.6 REPORTABLE EVENT ACTION

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

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

- a. A report shall be submitted to the Commission pursuant to the requirements of 10 CFR 50.73.
- b. Each Licensee Event Report submitted to the Commission shall be submitted to the NFSC Chairman and the Vice President-Nuclear Power and be reviewed by the SNSC.

## 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit Violation Report shall be reported to the Commission, the Vice President-Nuclear Power and to the NFSC Chairman immediately.
- c. The Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NFSC Chairman and the Vice President-Nuclear Power within 10 days of the violation.

## 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained covering the activities referenced below:

- a. The requirements and recommendations of Sections 5.2 and 5.3 of ANSI N18.7-1976 and Appendix A of Regulatory Guide 1.33, Revision 2 except as provided in the Quality Assurance Program Description (QAPD).
- b. Process Control Program implementation.
- c. Offsite Dose Calculation Manual implementation.

- d. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Revision 1, April 1974 and Regulatory Guide 4.1, Revision 1, April 1975.
- e. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with the Quality Assurance Program Description (QAPD).

6.8.3 The Quality Assurance Program Description (QAPD) shall describe the mechanism for making temporary changes.

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

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

- (i) training of personnel,
- (ii) procedures for sampling and analysis, and
- (iii) provisions for maintenance of sampling and analysis equipment

## 6.9 REPORTING REQUIREMENTS

### Routine Reports and Reportable Occurrences

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

## STARTUP REPORT

- 6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) amendments to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the appropriate tests identified in the UFSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any specific details required in license conditions based on other commitments shall be included in this report.
- 6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

## ANNUAL RADIATION EXPOSURE REPORT<sup>1</sup>

- 6.9.1.3 Routine reports of occupational radiation exposure data during the previous calendar year shall be submitted no later than April 30 of each year.
- 6.9.1.4 The annual radiation exposure reports shall provide a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions<sup>2</sup>, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter TLD or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

## ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT<sup>3</sup>

- 6.9.1.5 Routine Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and statistical evaluation of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The report shall also include the results of land use censuses required by Specification 4.11.B.

The Annual Radiological Environmental Operating Reports shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements as described in the ODCM. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps<sup>4</sup> covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 4.11.C; discussion and all deviations from the sampling schedule of Table 4.11-1; and discussion of all analyses in which the LLD required by Table 4.11-3 was not achievable.

## RADIOACTIVE EFFLUENT REPORT<sup>5</sup>

- 6.9.1.6 Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 12 months of operation shall be submitted by May 1 of each year.

The Radioactive Effluent Release Report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report to be submitted by May 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distribution of wind speed, wind direction, and atmospheric stability<sup>6</sup>.

This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents releases from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figure 5.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. Approximate and conservative approximate methods are acceptable. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM).

Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1, October 1977.

The Radioactive Effluent Release Report shall include the following information for each class of solid waste (in compliance with 10 CFR Part 61) shipped offsite during the report period:

- a. container volume,
- b. total curie quantity (specify whether determined by measurement or estimate),



- c. principal radionuclides (specify whether determined by measurement or estimate),
- d. source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to Unrestricted Areas of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Radioactive Effluent Release Report shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 4.11.B.

#### MONTHLY OPERATING REPORT

- 6.9.1.7 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or pressurizer safety valves shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, no later than the 15th of each month following the calendar month covered by the report.

#### CORE OPERATING LIMITS REPORT (COLR)

- 6.9.1.8 Core operating limits shall be established and documented prior to each reload cycle, or prior to any remaining portion of the cycle, for the following:
  - a. Axial Flux Difference limits for Specifications 3.10.2.
  - b. Height Dependent Heat Flux Hot Channel Factor for Specification 3.10.2.
  - c. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3.10.2.
  - d. Shutdown Bank Insertion Limit for Specification 3.10.4.

e. Control Bank Insertion Limits for Specification 3.10.4.

6.9.1.9 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

a. WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY," July 1985 (W Proprietary). (Methodology for Specification 3.10.4 - Shutdown Bank Insertion Limit, Control Bank Insertion Limits and 3.10.2 - Nuclear Enthalpy Rise Hot Channel Factor.)

b. WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES - TOPICAL REPORT", September 1974 (W Proprietary). (Methodology for Specification 3.10.2 - Axial Flux Difference (Constant Axial Offset Control).)

c. T.M. Anderson to K. Kniel (Chief of Core Performance Branch, NRC) January 31, 1980 - Attachment: Operation and Safety Analysis Aspects of an Improved Load Follow Package. (Methodology for Specification 3.10.2 - Axial Flux Difference (Constant Axial Offset Control).)

d. NUREG-0800, Standard Review Plan, US Nuclear Regulatory Commission, Section 4.3, Nuclear Design, July 1981. Branch Technical Position CPB 4.3-1, Westinghouse Constant Axial Offset Control (CAOC), Rev. 2, July 1981. (Methodology for Specification 3.10.2 - Axial Flux Difference (Constant Axial Offset Control).)

e. WCAP-10266-P-A Rev. 2, "THE 1981 VERSION OF WESTINGHOUSE EVALUATION MODEL USING BASH CODE", March 1987, (W Proprietary). (Methodology for Specification 3.10.2 Height Dependent Heat Flux Hot Channel Factor.)

f. WCAP-12945-P, Westinghouse "Code Qualification Document for Best Estimate LOCA Analyses", July, 1996

6.9.1.10 The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.

6.9.1.11 The COLR, including any mid-cycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

### Special Reports

6.9.2 Special reports shall be submitted to the NRC Regional Administrator of the Region I Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. DELETED
- b. DELETED
- c. Sealed source leakage in excess of limits (Specification 4.15).
- d. The complete results of the steam generator tube inservice inspection (Specification 4.13.C.).
- e. Radioactive effluents (Specification 3.9).
- f. Radiological environmental monitoring (Specification 4.11).
- g. Meteorological monitoring instrumentation (Specification 3.15).
- h. Inoperable radiation and hydrogen monitoring instrumentation (Specification 3.5) outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.
- i. Operation of overpressure protection system (Specification 3.1.A.4).

### 6.10 RECORD RETENTION

6.10.1 The types of plant records required to be maintained are delineated in the Quality Assurance Program Description.

6.10.2 The minimum retention periods for plant records are defined in the Quality Assurance Program Description.

## 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

## 6.12 HIGH RADIATION AREA

6.12.1 As an acceptable alternative to the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2):

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of Specification 6.12.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry to such areas and the keys shall be maintained under the administrative control of the Radiation Protection Manager and/or the Senior Watch Supervisor on duty.

## 6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines), or NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-26 dated October 24, 1980.

6.13.2 By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines of NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.14 PROCESS CONTROL PROGRAM (PCP)

6.14.1 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:
  - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information,
  - b. a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes, and
  - c. documentation of the fact that the change has been reviewed and found acceptable by the SNSC.
2. Shall become effective upon review and acceptance by the SNSC.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.15.1 The ODCM shall be approved by the Commission prior to implementation.

6.15.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:
  - a. sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluation justifying the change(s),
  - b. a determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations, and
  - c. documentation of the fact the change has been revised and found acceptable by the SNSC.

2. Shall become effective upon review and acceptance by the SNSC.

6.16 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE SYSTEMS

6.16.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change was made. The discussion of each change shall contain:

- a. a summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59,
- b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information,
- c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems,
- d. an evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto,
- e. an evaluation of the change, which shows the expected maximum exposures to individuals in the Unrestricted Area and to the general population that differ from those previously estimated in the license application and amendments thereto,
- f. a comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes are to be made;
- g. an estimate of the exposure to plant operating personnel as a result of the change, and
- h. documentation of the fact that the change was reviewed and found acceptable by the SNSC.

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- 1 A single submittal may be made for a multiple-unit station. The submittal should  
combine those sections that are common to all units at the station.
- 2 This tabulation supplements the requirements of 10 CFR Part 20.2206.
- 3 A single submittal may be made for a multiple unit station.
- 4 One map shall cover stations near the site boundary; a second shall include more  
distant stations.
- 5 A single submittal may be made for a multiple unit station. The submittal should  
combine those sections that are common to all units at the station; however, for units  
with separate radwaste systems, the submittal shall specify the releases of  
radioactive material from each unit.
- 6 In lieu of submission with the Radioactive Effluent Release Report, the licensee has  
the option of retaining this summary of required meteorological data onsite in a file  
that shall be provided to the NRC upon request.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 206 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 letter dated June 2, 1999, as supplemented by letter dated August 25, 1999, Consolidated Edison Company of New York, Inc. (Con Ed) (the licensee) submitted a request for a license amendment to revise the administrative controls (Section 6) of the Indian Point Nuclear Generating Unit No. 2 (IP2) Technical Specifications (TSs). The modified administrative controls would revise and relocate certain quality assurance (QA) related requirements to the licensee's Quality Assurance Program Description (QAPD) in accordance with NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specifications Administrative Controls Related to Quality Assurance," dated December 12, 1995. The August 25, 1999, letter provided clarifying information that did not change the initial proposed no significant hazards consideration.

This evaluation addresses the proposed relocation of QA related administrative control provisions (currently in TS Section 6.5, "Review and Audit," TS Section 6.8, "Procedures and Programs," and TS Section 6.10, "Record Retention") from the current TS to the QAPD in accordance with 10 CFR 50.36 (60 FR 30957). The relocation of these Sections to the QAPD and their subsequent control pursuant to 10 CFR 50.54(a) would constitute the bases for the licensee's continued compliance with the requirements of Appendix B to 10 CFR Part 50.

## 2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings (2) limiting conditions for operation (LCO); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

10 CFR 50.36 provides, with respect to LCO, four criteria to be used in determining whether particular safety functions are required to be included in the TS. While the four criteria specifically apply to LCO, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS (60 FR 36957). Addressing administrative controls, 10 CFR 50.36(5) states that they "are



the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is, therefore, that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has determined that requirements that are not specifically required under 10 CFR 50.36(c)(6) and that are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety can be removed from administrative controls. Existing TS requirements, therefore, may be relocated to more appropriate documents (e.g. Security Plan, QA Plan, and Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(6), particular details of administrative controls may be relocated to licensee-controlled documents where 10 CFR 50.54, 10 CFR 50.59, or other regulations provide adequate regulatory control.

### 3.0 EVALUATION

In Section 3.1 of the QAPD, the licensee defines the structures, systems, components, and activities to which the Quality Program is applied.

#### 3.1 Review and Audit

The licensee proposed that the review and audit functions for the onsite and offsite committees specified in the existing TS 6.5 be relocated from the TS to the QAPD such that future changes could be made pursuant to 10 CFR 50.54(a).

Section 13.4, "Operational Review," of NUREG-0800, the "Standard Review Plan" (SRP), provides the acceptance criteria used by the staff to evaluate TS provisions related to the plant staff review of operational activities performed by licensee organizational units fulfilling the review and audit function. This acceptance criterion is based on meeting the relevant requirements of 10 CFR 50.40(b) as it relates to the licensee being technically qualified to engage in licensed activities, and of Appendix B to 10 CFR Part 50 as it relates to the review and audit functions required by the licensee's quality assurance program. Therefore, TS provisions associated with the review and audit function satisfies the criteria in both 10 CFR 50.36(c)(6), and Appendix B to 10 CFR Part 50. As stated above, however, these provisions do not satisfy the current criteria for inclusion in TS and can be relocated to the licensee's QA program description.

This approach is consistent with AL 95-06 which provides guidance for relocating TS administrative requirements. This approach would also result in an equivalent level of regulatory authority while providing for a more appropriate change control process. On this basis, the staff has concluded that the review and audit functions identified above are not required to be included in the TS to protect public health and safety, and may be relocated to the QAPD.

#### 3.2 Procedures and Programs

The licensee proposed to relocate, with only editorial changes, the requirements for procedure changes and temporary procedure changes from TS 6.8 to the QAPD. The licensee states that

any future changes associated with the procedure requirements will be controlled under 10 CFR 50.54(a).

This approach is consistent AL 95-06, which provides guidance for relocating TS administrative requirements. On this basis, the staff has concluded that the procedure review function identified above are not required to be included in the TS to protect public health and safety, and may be relocated to the QAPD.

### 3.3 Record Retention

With minor editorial changes, the licensee proposed to relocate the record retention requirements from TS 6.10, "Record Retention," to the QAPD. Once relocated to the QAPD future changes to these record retention requirements will be adequately addressed by 10 CFR 50.54(a). In addition to specific record retention commitments in the QAPD, the licensee is committed to ANSI N 18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and ANSI N45.2.9-1974, "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants," (as endorsed by Regulatory Guide 1.88, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records," Revision 2) to satisfy the regulatory requirements of 10 CFR Part 50, Appendix B, Criteria XVII, "Quality Assurance Records."

The licensee states that any future changes to the record retention provisions in the QAPD will be made in accordance with 10 CFR 50.54(a). In addition, numerous other regulations such as 10 CFR Part 20, Subpart L, and 10 CFR 50.71 require the retention of certain records related to operation of the nuclear plant. This approach is consistent with AL 95-06 which provides guidance for relocating TS administrative requirements. On this basis, the staff has concluded that the record retention functions identified above are not required to be included in the TS to protect the public health and safety, and may be relocated to the QAPD.

### 4.0 CONCLUSION

The staff evaluated the licensee's proposal and concluded that the proposed relocation of QA related administrative control provisions (Section 6.5, "Review and Audit," Section 6.8, "Procedures and Programs," and Section 6.10, "Records Retention") from the TS to the QAPD satisfies AL 95-06 provisions and 10 CFR 50.36 requirements and, once relocated to the QAPD and controlled pursuant to 10 CFR 50.54(a), constitute the bases for the licensee's continued compliance with the requirements of Appendix B to 10 CFR Part 50.

### 5.0 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.

### 6.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental

impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## 7.0 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.

Principal Contributor: P Narbut

Date: February 25, 2000