

and/or catastrophic system failure. Since the proposed change does not involve the introduction of new or redesigned plant equipment, failure mechanisms are not affected.

The documents have been previously reviewed and approved by the NRC and it was determined that they provide an acceptable means to determine core operating limits. As a result, the probability of occurrence of accidents previously evaluated is not significantly increased. Since the documents provide NRC approved methodologies for determining core operating limits, the addition of the documents to Technical Specifications or use of the documents to determine core operating limits will not significantly increase the consequences of any accident previously evaluated.

C.2. The proposed change does not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed change to add three documents to the list of documents that provide the analytical methods to determine core operating limits is administrative in nature and does not involve the addition of any new or different types of safety related equipment, nor does it involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the safety analysis. No safety related equipment or function will be altered as a result of the proposed changes. Also, the procedures governing normal plant operation and recovery from an accident are not changed by the proposed Technical Specification changes. Since no new failure modes or mechanisms are added by the proposed changes, the possibility of a new or different kind of accident is not created.

C.3. The proposed change does not involve a significant reduction in a margin of safety.

Plant safety margins are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. There will be no changes to either the physical design of the plant or to any of these settings and limits as a result of adding references to the new documents. The ability to mitigate the consequences of all accidents previously evaluated will be maintained. Therefore, the margin of safety is not significantly affected.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the

requested amendments involve no significant hazards consideration.

*Local Public Document Room*

*Location:* Waukegan Public Library, 128 N. County Street, Waukegan, Illinois 60085.

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*Consolidated Edison Company of New York, Docket No. 50-247, Indian Point Nuclear Generating Unit No. 2, Westchester County, New York Date of amendment request:* September 19, 1994.

*Description of amendment request:* The proposed amendment would revise Technical Specification (TS) Section 4.4.A.3 to reference the testing frequency requirements of 10 CFR Part 50, Appendix J, and to state that NRC approved exemptions to the applicable regulatory requirements are permitted. This proposed administrative revision simply deletes the paraphrased language and directly references Appendix J.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

Criterion 1—Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed change will provide a one-time exemption from the 10 CFR [Part] 50, Appendix J Section III.D.1.(a) leak rate test schedule requirement. This change will allow for a one-time test interval for Type A Integrated Leak Rate Tests (ILRTs) of approximately 70 months.

Leak rate testing is not an initiating event in any accident, therefore this proposed change does not involve a significant increase in the probability of a previously evaluated accident.

Type A tests are capable of detecting both local leak paths and gross containment failure paths. The history at IP-2 [Indian Point 2] demonstrates that Type B and C Local Leak Rate Tests (LLRTs) have consistently detected any excessive local leakages.

Administrative controls govern the maintenance and testing of containment penetrations such that the probability of excessive penetration leakage due to improper maintenance or valve misalignment is very low. Following maintenance on any containment penetration, an LLRT is performed to

ensure acceptable leakage levels, following any LLRT on a containment isolation valve, an independent valve alignment check is performed. Therefore, Type A testing is not necessary to ensure acceptable leakage rates through containment penetrations.

While Type A testing is not necessary to ensure acceptable leakage rates through containment penetrations, Type A testing is necessary to demonstrate that there are no gross containment failures. Structural failure of the containment is considered to be a very unlikely event, and in fact, since IP-2 has been in operation it has never failed a Type A ILRT. Therefore, a one-time exemption increasing the interval for performing an ILRT should not result in a significant decrease in the confidence in the leak tightness of the containment structure.

The proposed change also revises Technical Specification 4.4.A.3 to reference the testing frequency requirements of 10 CFR [Part] 50, Appendix J, and to state that NRC approved exemptions to the applicable regulatory requirements are permitted. The current language of TS 4.4.A.3 paraphrases the requirements of Section III.D.1.(a) of Appendix J. The proposed administrative revision simply deletes the paraphrased language and directly references Appendix J. No new requirements are added, nor are any existing requirements deleted. Any specific changes to the requirements of Section III.D.1.(a) will require a submittal from Consolidated Edison under 10 CFR 50.12 and subsequent review and approval by the NRC prior to implementation. The proposed change is stated generically to avoid the need for further TS changes if different exemptions are approved in the future.

The proposed change, in itself, does not affect reactor operations or accident analysis and has no radiological consequences. The change provides clarification so that future Technical Specifications changes will not be necessary to correspond to applicable NRC approved exemptions from the requirements of Appendix J.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Criterion 2—Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The proposed exemption request does not affect normal plant operations or configuration, nor does it affect leak rate test methods. The proposed change allows a one-time test interval of