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May 3, 2001

Re: Indian Point Unit No. 2
Docket No. 50-247
NL 01-057

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

SUBJECT: Indian Point Nuclear Generating Unit No. 2 – Response to Request for Additional Information Regarding Proposed Administrative Changes to Technical Specifications (TAC No. MA9033)

References:

1. RA01-073, NRC letter to Consolidated Edison, "Indian Point Nuclear Generating Unit No. 2 – Request for Additional Information Regarding Proposed Administrative Changes to Technical Specifications (TAC No. MA9033)," dated March 29, 2001
2. NL00-015, Consolidated Edison letter to NRC, "Proposed Technical Specification Amendment Consisting of Administrative Changes," dated February 14, 2000

By letter dated February 14, 2000, the Consolidated Edison Company of New York, Inc. (Con Edison) submitted an application for an amendment to the Technical Specifications (TS) for Indian Point Unit No. 2 (IP2). The proposed amendment would make administrative changes that, in part, correct listing and editorial errors, revise wording in certain TS to correspond to wording used in applicable regulations, reflect actual level indication components, correct an organizational title change, and correct typographical and grammatical errors. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed this submittal, determined that additional information was required to complete its review, and requested that additional information in its letter of March 29, 2001. This letter submits Con Edison's response to the NRC's request for additional information.

Attachment 1 to this letter provides the requested additional information. As a result of the request for additional information, Con Edison requests withdrawal of the proposed TS changes for Section 6.12.1.

There are no commitments in this letter.

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ATTACHMENT 1 TO NL 01-057

**Response to Request for Additional Information Regarding Proposed
Administrative Changes to Technical Specifications**

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

Should you or your staff have any questions regarding this submittal, please contact Mr. John F. McCann, Manager, Nuclear Safety and Licensing at (914) 734-5074.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Alan Blind". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Alan Blind
Vice President - Nuclear Power

cc:

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Response to Request for Additional Information
Technical Specification Administrative changes
Indian Point Unit 2

Request No. 1

TS Table 3.6-1 and Table 4.4-1

Con Edison proposed to modify TS Table 3.6-1 and Table 4.4-1 to include non-automatic containment isolation valves IIP-500 through IIP-507. According to TS Basis Section 3.6, the valves listed in Table 3.6-1 are to be closed under post-accident conditions according to plant procedures. Con Edison stated that the proposed change had no affect on the plant operating or emergency procedures. Clarify whether the above valves are listed in the appropriate plant operating and emergency procedures.

Response to Request No. 1

Con Edison procedures provide administrative controls for IIP-500 through IIP-507 during post accident and normal plant operation. Specifically SOP-10.6.4, Rev. 2, "Operation and Control of Non-Automatic Containment Isolation Valves", provides direction to ensure that the valves are closed during the Post Accident Period in accordance with requirements of related protection, safeguards, or essential service systems, per Technical Specification 3.6. In addition, administrative controls in AOI-27.1.9, Rev. 30, "Control Room Inaccessibility Safe Shutdown Control," COL-1.1, Rev. 23, "Reactor Coolant Systems," and COL-10.6.2, Rev. 19, "Containment Integrity," provide the appropriate controls for IIP-500 through IIP-507 during normal plant operations and emergency conditions.

Response to Request for Additional Information
Technical Specification Administrative Changes
Indian Point Unit 2

Request No. 2

TS Section 6.12.1

Con Edison proposed to revise TS Section 6.12.1, "Control of Access to High Radiation Areas," by replacing an outdated reference to 10 CFR 20.203(c)(2) with references to 10 CFR 20.1601(a) and 10 CFR 20.1601(b). However, TS 6.12.1, does not fully agree with the requirements in the revised regulation. Con Edison should either request NRC approval of alternative methods for controlling access to high radiation areas in accordance with 10 CFR 20.1601(c) or provide revised wording in TS 6.12.1 to reflect that used in the Standard Technical Specification (NUREG-1431, Vol. 1, Rev. 2) Section 5.7, "High Radiation Area."

Response to Request No.2

Con Edison withdraws its request to revise TS Section 6.12.1.