

Note to: Sam Collins      NRR

From: Brian Sheron      NRR

Subject: Indian Point 2 Restart Review Status

The staff review of Indian Point 2 operational assessment is underway, however additional information is need to complete our review and prepare our Safety Evaluation. We have communicated to ConEd that the staff needs the following information: 1) a revised probability of detection in u-bend region, 2) a revised operational assessment based on the actual number of months that they expect to operate instead of 10 months, and 3) a revised analysis using an acceptable burst prediction model. Our current schedule for completion of the Safety Evaluation is July 19, 2000, however that schedule is based on ConEd providing satisfactory responses to the issues listed above by June 30, 2000.

The Region has recently completed an inspection of steam generator issues, and is preparing a "quick look" letter for issuance on July 10, 2000. This letter will address the root cause and corrective actions for the SGT failure from a regulatory/enforcement point of view. Our Safety Evaluation will address the root cause and corrective actions as they relate to our decision on approving continued operation with the existing SG. The licensee has provided responses to our questions regarding root cause, and staff is reviewing the submittals to determine whether they accurately describe the root cause and whether appropriate corrective actions have been implemented.

Additionally, the staff is reviewing an amendment request related to alternative source terms. The licensee needs this amendment to enter Mode 4. We expect to be prepared to issue this amendment by COB 6/28/00.

J/182

The following is background on the license amendment for Indian Point 2, which affects the control room air filtration system and the containment air filtration and cooling system, among other items:

The amendment consists of changes to the TSs which result from implementation of an alternate radiological source term as permitted by 10 CFR 50.67 and implements plant modifications to the containment air handling systems and the control room air handling systems related to the use of the alternate source term. This amendment is the product of a pilot proposed by Consolidated Edison. The NRC solicited pilot projects such as this to obtain insights in support of the rulemaking for the implementation of alternative source terms (64 FR 71990) and the supporting regulatory guidance. Indian Point 2 is the pilot plant for reanalysis of radiological dose consequences using the Alternate Source Term. Indian Point 2 made an initial submittal of their reanalysis in 1996, but this was modified after the staff discussed several areas that needed refinement. They again submitted a radiological analysis of the FSAR design basis accidents, along with Technical Specification changes, on November 18, 1999. In response to staff questions, additional information was submitted by letters dated February 14, March 21, April 6, April 13, and May 11, 2000.

The following describes the impact of the Indian Point 2 license amendment on the Technical Specification (TS) requirements which must be met before heating the reactor coolant system above 200 degrees F:

1. TS 3.3.H says "The control room air filtration system shall be operable at all times when containment integrity is required."

By TS 3.6.A, containment integrity is required whenever the reactor is above cold shutdown. Cold shutdown is defined in TS as Tavg less than or equal to 200 degrees F. Therefore, the control room air filtration system must be operable above 200 degrees F.

2. The licensee has modified the control room air filtration system to initiate pressurization mode for a safety injection signal or a control room high radiation signal, and has changed the air flow rate through the filters.

TS 4.5.E.2 is a surveillance requirement which requires certain air flow rates for the control room air filtration system in order to pass the surveillance. These flow rates are changed in the license amendment.

TS 4.5.E.4 requires the control room air filtration system to switch into recirculation mode of operation for a safety injection signal or a control room high radiation signal. In the license amendment, this is changed to the pressurization mode.

Since the present surveillance requirements can not be met, the control air filtration system is inoperable and the licensee can not heat the plant above 200 degrees F.