

August 17, 2000

Mr. James Knubel
Chief Nuclear Officer
Power Authority of the State
of New York
123 Main Street
White Plains, NY 10601

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING IMPROVED
STANDARD TECHNICAL SPECIFICATIONS - INDIAN POINT NUCLEAR
GENERATING UNIT NO. 3 (TAC NO. MA5529)

Dear Mr. Knubel:

The NRC staff is reviewing your application for conversion to Improved Standard Technical Specifications. In order to complete our review, we request that you provide responses to the enclosed questions. These questions were forwarded by telefax to Mr. Kevin Kingsley of your staff on July 25, 2000. We understand that you will provide your response by August 24, 2000.

Sincerely,

/RA/

George F. Wunder, Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION REGARDING INDIAN POINT UNIT 3
PROPOSED TECHNICAL SPECIFICATION CHANGE CONVERSION TO
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

1. NUREG-1431, Standard Technical Specifications, Surveillance Requirement (SR) 3.3.1.16 and SR 3.3.2.10 requires that Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) response times are verified to be within limits typically on a refueling time period staggered test basis. The licensee has proposed a NOTE for SR 3.3.1.10 and SR 3.3.1.16 which states that the channel calibration surveillance shall "include verification that the time constants are adjusted to the prescribed values." Discuss why the proposed Improved Technical Specifications (ITS) described in Table 3.3.1-1, Items 11 (Undervoltage Reactor Coolant Pumps (RCPs)) and Item 12 (Underfrequency RCPs) and Table 3.3.2-1, Item 6.d (Loss-of-Offsite Power - Non SI Blackout Sequence Signal) for Indian Point 3 (IP3) omitted the performance of the subject sensor-to-actuation device time response surveillance.
2. NUREG-1431, Standard Technical Specifications, requires that the allowable values of an upper and lower time delay be specified for the loss of power diesel generator start relays for the loss of voltage and degraded voltage functions. The upper time delay is used to prevent unnecessary separation from the offsite power source as a result of motor starting and other transients. The second time delay determines how long the plant will operate at the degraded voltage level. Explain why the proposed ITS changes (i.e., SR 3.3.5.2) do not include the requirement for upper and lower time delays.
3. Note 1 of Table 3.5-3 in the current IP3 Technical Specifications states that "If the 138kv and 13.8kv sources of offsite power are available and the conditions of column 3 or 4 (total number of degraded voltage channels operable) cannot be met within 72 hours then the requirements of 3.7.c.1 or 2 shall be met." IP3 Technical Specification 3.7.c.1 requires a plant shutdown within 30 hours. The proposed ITS changes described by SR 3.3.5.2 implies that one degraded voltage channel can remain inoperable until the plant drops below Mode 4. One channel could experience an incipient failure mode (setpoint drift/improper calibration) while the other channel is tripped under Limiting Condition for Operation 3.3.5.B which would result in the loss of the degraded voltage function. The licensee is requested to address the technical adequacy of the proposed change for safe plant operation.
4. By letter dated February 3, 1994, the licensee stated that the loop accuracy/setpoint calculations show that the existing degraded voltage trip setting or allowable values does not provide sufficient margin to accommodate postulated uncertainties for a 30-month period. Provide degraded voltage setpoint calculations showing all uncertainties used to establish the proposed allowable values in SR 3.3.5.2.b and SR 3.3.5.2.c. Verify that voltages just above the setpoints are adequate to allow all equipment to start and operate properly at all voltage levels down to and including the 120 volt levels.
5. Provide the RCP undervoltage setpoint calculations showing all uncertainties used to establish the proposed allowable values in the ITS SR 3.3.1.11.

Indian Point Nuclear Generating
Station Unit No. 3

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