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New York Power Authority

James Knubel
Senior Vice President and
Chief Nuclear Officer

September 6, 2000
IPN-00-062

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Proposed Change to Section 6.14 of the
Administrative Section of Technical Specifications

Dear Sir:

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise Technical Specification section 6.14, "Containment Leakage Rate Testing Program." This revision takes a one time exception to the ten (10) year frequency of the performance-based leakage rate testing program for Type A tests as required by NEI 94-01, revision 0, "Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J", and endorsed by 10 CFR 50, Appendix J, Option B. The one time exception is to the requirement of NEI 94-01 to perform an integrated leak rate test (ILRT) at a frequency of up to ten years, with allowance for a 15 month extension. The exception is to allow ILRT testing within fifteen years from the last ILRT, performed on December 2, 1990. This application represents a cost beneficial licensing change. The integrated leak rate test imposes significant expense on the station while the safety benefit of performing it within 10 years, versus 15 years, is minimal.

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License." Attachment I to the application contains the proposed changes to the Technical Specification, and Attachment II contains the associated safety evaluation. A mark-up of the affected Technical Specification pages is provided in Attachment III for information only. A markup to show the effects on the Improved Technical Specification pages, which are currently under review by the NRC, is included as Attachment IV.

A copy of this application and the associated attachments is being provided to the designated New York State official in accordance with 10 CFR 50.91.

A017

These are no new commitments made by the Authority in this letter. The Power Authority requests review and approval of this application prior to February 1, 2001 in order to incorporate these changes into our plant schedule prior to the upcoming refueling outage, currently scheduled for May 2001. If you have any questions, please contact Ms. Charlene Faison.

Very truly yours,

J. Knubel
Senior Vice President and Chief
Nuclear Officer

Attachments
Enclosure

cc: U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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Washington, DC 20555

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
NEW YORK POWER AUTHORITY	)	Docket No. 50-286
Indian Point 3 Nuclear Power Plant	)	

APPLICATION FOR AMENDMENT TO THE OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, the Power Authority of the State of New York, as holder of the Facility Operating License No. DPR-64, hereby applies for an amendment to the Technical Specifications contained in Appendix A of the license.

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise Technical Specification section 6.14, "Containment Leakage Rate Testing Program." This revision takes a one time exception to the ten (10) year frequency of the performance-based leakage rate testing program for Type A tests as required by NEI 94-01, revision 0, "Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J", and endorsed by 10 CFR 50, Appendix J, Option B. The one time exception is to the requirement of NEI 94-01 to perform an integrated leak rate test (ILRT) at a frequency of up to ten years, with allowance for a 15 month extension. The exception is to allow ILRT testing within fifteen years from the last ILRT, performed on December 2, 1990. This application represents a cost beneficial licensing change. The integrated leak rate test imposes significant expense on the station while the safety benefit of performing it within 10 years, versus 15 years, is minimal.

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POWER AUTHORITY OF THE STATE OF NEW YORK

J. Knubel
Senior Vice President and
Chief Nuclear Officer

STATE OF NEW YORK
COUNTY OF WESTCHESTER
Subscribed and sworn to before me
this 6th day of Sept., 2000.

Eileen E. O'Connor
Notary Public

EILEEN E. O'CONNOR
Notary Public, State of New York
No. 4991062
Qualified in Westchester County
Commission Expires January 21, 2002

ATTACHMENT I TO IPN-00-062

PROPOSED CHANGE TO SECTION 6.14 OF THE ADMINISTRATIVE SECTION OF THE TECHNICAL SPECIFICATIONS

Revise Appendix A as follows:

Remove Page	Insert Page
6-22	6-22
6-23	6-23

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

6.12.2* In addition to the requirements of 6.12.1 above, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose greater than 1000 mrem**, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the plant Radiological and Environmental Services Manager or his designee.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 Environmental qualification of electric equipment important to safety shall be in accordance with the provisions of 10 CFR 50.49. Pursuant to 10 CFR 50.49, Section 50.49(d), the EQ Master List identifies electrical equipment requiring environmental qualification.

6.13.2 Complete and auditable records which describe the environmental qualification method used, for all electrical equipment identified in the EQ Master List, in sufficient detail to document the degree of compliance with the appropriate equipments of 10 CFR 50.49 shall be available and maintained at a central location. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.14 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, Dated September 1995" as modified by the following exceptions:

a. ANS 56.8 - 1994, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

b. NEI 94-01 - 1995, Section 9.2.3: The first Type A test performed after the December 2, 1990 Type A test shall be performed no later than December 1, 2005.

The peak calculated primary containment internal pressure, P_a, is 42.40 psig. The minimum test pressure is 42.42 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.1% of primary containment air weight per day.

Leakage acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and C tests and $\leq 0.75\ L_a$ for Type A tests;

---

* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

** Measured at 30 centimeters (12 inches) from radiation sources external to the body, or 30 centimeters (12 inches) from any surface that the radiation penetrates.

b. Air lock testing acceptance criteria are:

1) Overall the air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$,

2) For each door, leakage rate is $\leq 0.01\ L_a$ when pressurized to $\geq P_a$.

c. Isolation valves sealed with the service water system leakage rate into containment acceptance criterion is $\leq$0.36 gpm per fan cooler unit.

d. Isolation Valve Seal Water System leakage rate acceptance criterion is 14,700 cc/hr at $1.1P_a$.

The provisions of Specification 1.12 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program. The provisions of Specification 4.1, "Applicability," as they relate to delay of 24 hours in applying an LCO following the discovery of a surveillance test not performed, are applicable to the Primary Containment Leakage Rate Testing Program.

ATTACHMENT II TO IPN-00-062

SAFETY EVALUATION FOR THE

PROPOSED CHANGE TO SECTION 6.14 OF THE ADMINISTRATIVE

SECTION OF THE TECHNICAL SPECIFICATIONS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

I. DESCRIPTION

This section provides a description of the proposed change to the Technical Specifications. This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise Technical Specification section 6.14, "Containment Leakage Rate Testing Program". This revision takes a one time exception to the ten (10) year frequency of the performance-based leakage rate testing program for Type A tests as required by NEI 94-01 (Reference 1). The one time exception is to the requirement of NEI 94-01 to perform an integrated leak rate test (ILRT) at a frequency of up to ten years, with allowance for a 15 month extension. The exception is to allow ILRT testing within fifteen years from the last ILRT, performed on December 2, 1990. This application represents a cost beneficial licensing change. The integrated leak rate test imposes significant expense on the station while the safety benefit of performing it within 10 years, versus 15 years, is minimal. The specific change is as follows:

1. **TS Bases, Section 6.14, page 6-22**

   Replace:

   "...as modified by the following exception:"

   With:

   "...as modified by the following exceptions."

   Add:

   "b. NEI 94-01 - 1995, Section 9.2.3: The first Type A Test performed after the December 2, 1990 Type A test shall be performed no later than December 1, 2005."

II. PURPOSE OF THE PROPOSED CHANGE

Indian Point 3's (IP3) current 10 year Type A test is due on December 2, 2000. This test is currently scheduled to be performed during the refuel outage (RO), RO11, scheduled for May 13, 2001. By allowing this one time exception, IP3 will:

- Perform the Type A test during refuel outage RO13, currently scheduled for May of 2005.
- Enjoy a substantial cost savings by not performing the Type A test for an additional five (5) years. Cost savings have been estimated this outage at $325,000 for actually performing the test and eliminating from schedule up to forty two hours of critical path outage time at a net savings of approximately $21,000 per hour.

The Authority expects a rule change to be sought that could eliminate the need for Type

A testing. We expect that the requested extension will allow time for this rule change to be processed.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGE

Implementing 10 CFR 50, Appendix J, Option B:

The testing requirements of 10 CFR 50, Appendix J, provide assurance that leakage through the containment, including systems and components that penetrate the containment, does not exceed the allowable leakage values specified in the Technical Specifications. The limitation of containment leakage provides assurance that the containment would perform its design function following an accident up to and including the plant design basis accident.

10 CFR 50, Appendix J, was revised, effective October 26, 1995, to allow licensees to choose containment leakage testing under Option A "Prescriptive Requirements" or Option B "Performance-Based Requirements." Amendment 174 (Reference 2) was issued to NYPA to permit implementation of 10 CFR 50, Appendix J, Option B. Amendment 174 added Technical Specification section 6.14 which requires Type A, B and C testing in accordance with Regulatory Guide (RG) 1.163 (Reference 3). Regulatory Guide 1.163 specifies a method acceptable to the NRC for complying with Option B by approving the use of NEI 94-01 and ANSI/ANS 56.8 - 1994 (Reference 4), subject to several regulatory positions in the guide.

Exceptions to the requirements of RG 1.163, are allowed by 10 CFR 50, Appendix J, Option B, Section V.B, "Implementation," which states "The Regulatory Guide or other implementing document used by a licensee, or applicant for an operating license, to develop a performance based leakage-testing program must be included, by general reference, in the plant technical specifications. The submittal for technical specification revisions must contain justification, including supporting analyses, if the licensee chooses to deviate from methods approved by the Commission and endorsed in a regulatory guide." Therefore, this application does not require an exemption to Option B.

The adoption of the Option B performance-based containment leakage rate testing program did not alter the basic method by which Appendix J leakage rate testing is performed, but it did alter the frequency of measuring primary containment leakage in Type A, B and C tests. Frequency is based upon an evaluation which looks at the "as found" leakage history to determine the frequency for leakage testing which provides assurance that leakage limits will be maintained. The changes to Type A test frequency did not directly result in an increase in containment leakage. Similarly, the proposed change to the Type A test frequency will not directly result in an increase in containment leakage.

The allowed frequency for testing was based upon a generic evaluation documented in NUREG-1493 (Reference 5). NUREG-1493 made the following observations with regard to decreasing the test frequency:

- "Reducing the Type A (ILRT) testing frequency to one per twenty years was found to lead to an imperceptible increase in risk. The estimated increase in risk is small because ILRTs identify only a few potential leakage paths that cannot be identified by Type B and C testing, and the leaks that have been found by Type A tests have been only marginally above the existing requirements. Given the insensitivity of risk to containment leakage rate, and the same fraction of leakage detected solely by Type A testing, increasing the

interval between ILRT testing had minimal impact on public risk."

- While Type B and C tests identify the vast majority (greater than 95%) of all potential leakage paths, performance-based alternatives are feasible without significant risk impacts. Since leakage contributes less than 0.1 percent of overall risk under existing requirements, the overall effect is very small.

The surveillance frequency for Type A testing in NEI 94-01 is at least once per 10 years based on an acceptable performance history (i.e., two consecutive periodic Type A tests at least 24 months apart where the calculated performance leakage rate was less than $1.0L_a$) and consideration of the performance factors in NEI 94-01, Section 11.3. Based on the July 27, 1987 and December 2, 1990 ILRTs, the current interval for IP3 is once every 10 years.

10 CFR 50 Appendix J, Option B Test Information

A Type A test can detect containment leakage due to a loss of structural capability. All other sources of containment leakage detected in Type A test analyses can be detected by the Type B and C tests.

Previous Type A tests confirmed that the IP3 reactor containment structure is extremely low leakage and represents minimal risk to increased leakage. The risk is minimized by continued Type B and Type C testing for direct communication with containment atmosphere. Also, the In-Service Inspection (ISI) program, maintenance rule inspection and the weld channel system provide confidence in containment integrity.

The results for the last four Type A test are reported in the following table for IP3:

Date	As Found Leakage (*)	Acceptance Limit (****)	Test Pressure (psia)
12/2/90	0.032	0.075	59.49
7/27/87	0.34**	0.075	59.89
8/4/82	0.034	0.075	60.00
08/02/78	0.14***	0.075	60.00

*This is the leakage attributable to containment leakage as well as a number of Type B and Type C leakage components being tested as part of the Type A test. The leakage in the fan cooler unit service water lines in 1978 would normally not be detected by Type A, B or C testing. The lines are part of a closed loop inside containment that is filled with water before and after postulated accidents (no active failure can cause loss of service water flow) and is therefore not a potential atmospheric leakage path. Other service water line testing would detect this leakage. The leakage is the percent (%) of containment air by weight per day.

** A leak through reactor coolant pump seal water return valve MOV-222 on penetration R line 17. Valve 221A was closed to isolate the leakage from MOV-222. MOV-222 is a containment leakage path in accordance with the FSAR and the TS. After isolation of

MOV-222, leakage dropped to within normal range.

*** A leak was identified in the #33 and #34 containment fan cooler service water supply and return lines inside containment.

**** The total allowable leakage is expressed in percent (%) of containment air by weight per day and is also 0.75 L_a (L_a, 0.1% of primary containment air by weight per day, is the leakage assumed in dose consequences) with 0.6 L_a the maximum leakage from Type B and C components.

The containment atmospheric leakage that is presented above would be detected in Type B and C testing.

Plant Operational Performance:

During power operation, instrument air leaks from air-operated valves inside containment and pressurizes the containment building. Instrumentation monitors containment pressure and annunciates conditions approaching the limits allowed by the Technical Specifications. This cycling of the containment pressure during operation amounts to a periodic integrated pressure test of the containment at a low differential pressure. Although not as significant as pressure resulting from a Design Basis Accident, the fact that the containment can be pressurized by leakage from air-operated valves provides a degree of assurance of containment structural integrity (i.e. no large leak paths in the containment structure). This feature is a complement to visual inspection of the interior and exterior of the containment structure for those areas that may be inaccessible for visual examination. In the event pressurization does occur, a leakage path may be present. Plant operators are aware of the implications of lack of pressurization during power operation. Administrative controls will be put into place during startup from the R11 outage to monitor containment depressurization activities and evaluate trends (e.g. frequency, duration) for indication of changes to containment leakage.

IWE/IWL Inservice Inspection (ISI) activities to support ILRT:

NYPA engineers perform IWE/IWL ISI inspection activities in support of the required Type A (ILRT) test. The IP3 Containment Inservice Inspection Program was established in 1998 and the first interval is from 1998 to 2008. There will be no change to the schedule for these inspections. The activities performed that assure continued containment integrity include:

- In RO10, during September of 1999, NYPA performed an IWE General Visual examination of the Containment Metal Liners (IWE - MC component) from elevation 46' to 191' (spring line). This inspection was found to be satisfactory. The Westinghouse ISI report for the metal liner, performed from September 19, 1999 to October 4, 1999, concluded that the general visual examination of metal containment from 46' elevation ring 2 up to and including ring 17, to the Dome area using binoculars and a 600,000 candle power light, was satisfactory. No evidence of degradation was detected. All accessible areas were examined.

- NYPA Engineering inspected and evaluated the condition of the dome's coating and determined it was acceptable for continual service. A report (i.e., IP3-RPT-STR-2968, Rev. 1) documents inspections of the coating above the spring line of the VC dome performed in November 1998 and followed up again in RO-10. The inspection concluded

that the observed peeling of the paint and any rust is superficial and no visible damage exists. No further degradation between inspections was observed.

- IWE/IWL containment ISI Program committed to perform the remainder of the first period Section XI examinations by September 8, 2001 as required by 10 CFR 50.55a.

Maintenance Rule Inspections to support ILRT:

Maintenance Rule Base line inspections were performed in the Summer of 1997 during RO9. An inspection of the containment building found no deficiencies that would challenge the pressure boundary integrity. The results of the inspections were documented in IP3-RPT-STR-2660, Rev 0. All inspections were performed in accordance with NYPA procedure SED-AD-022 "Condition Monitoring of Maintenance Rule Structures."

Other inspections have been performed by 3PT-A2 "Containment Structural Inspection" without any significant findings. The Authority intends to continue to perform these inspections.

Weld Channel and Penetration Pressurization System (WCCPPS)

The WCCPPS is described in FSAR Section 6.6. Section 6.6.1 states that the WCCPPS provides "pressurized gas to all containment penetrations and most liner inner weld seams such that, in the event of a LOCA, there would be no leakage through these potential leakage paths from the containment to the atmosphere." A design function of the WCCPPS is also to provide a continuous, sensitive, and accurate means of monitoring leakage of selected containment isolation valves, the air lock door seals and containment welds that are pressurized by this system during normal operation. The WCCPPS is maintained at a pressure above the containment peak accident pressure during normal operation so that any postulated leakage past the monitored barriers will be detected and can be investigated. This system provides positive indication that liner welds remain leak tight. This system also provides positive indication that a number of penetrations and isolation valves continue to meet Type B and C test acceptance criteria.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based upon the following information:

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed revision to Technical Specifications adds a one time extension to the current interval for Type A testing. The current test interval of 10 years, based on past performance, would be extended on a one time basis to 15 years from the last Type A test. The proposed extension to Type A testing cannot increase the probability of an accident previously evaluated since the containment Type A testing extension is not a modification and the test extension is not of a type that could lead to equipment failure or accident initiation. The proposed extension to Type A testing does not involve a significant increase in the consequences of an accident since research documented in NUREG-1493 has found that, generically, very few potential containment leakage paths are not identified by Type B and C tests. The NUREG concluded that reducing the Type

A (ILRT) testing frequency to one per twenty years was found to lead to an imperceptible increase in risk. IP3 provides a high degree of assurance through testing and inspection that the containment will not degrade in a manner detectable only by Type A testing. The last four Type A tests show leakage to be below acceptance criteria, indicating a very leak tight containment. Inspections required by the maintenance rule and ASME code are performed in order to identify indications of containment degradation that could affect that leak tightness. The weld channel system will monitor the leak tightness of liner plate welds in the containment during plant operation as required by Technical Specifications. Type B and C testing required by Technical Specifications will identify any containment opening such as valves that would otherwise be detected by the Type A tests. These factors show that an IP3 Type A test extension will not represent a significant increase in the consequences of an accident.

2. Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed revision to Technical Specifications adds a one time extension to the current interval for Type A testing. The current test interval of 10 years, based on past performance, would be extended on a one time basis to 15 years from the last Type A test. The proposed extension to Type A testing cannot create the possibility of a new or different type of accident since there are no physical changes being made to the plant and there are no changes to the operation of the plant that could introduce a new failure mode creating an accident or affecting the mitigation of an accident.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

The proposed revision to Technical Specifications adds a one time extension to the current interval for Type A testing. The current test interval of 10 years, based on past performance, would be extended on a one time basis to 15 years from the last Type A test. The proposed extension to Type A testing will not significantly reduce the margin of safety. The NUREG 1493 generic study of the effects of extending containment leakage testing found that a 20 year extension in Type A leakage testing resulted in an imperceptible increase in risk to the public. NUREG -1493 found that, generically, the design containment leakage rate contributes about 0.1 percent to the individual risk and that the decrease in Type A testing frequency would have a minimal affect on this risk since 95% of the potential leakage paths are detected by Type C testing. Online testing of the integrity of liner plate welds using the weld channel system and regular inspections will further reduce the risk of a containment leakage path going undetected.

V. IMPLEMENTATION OF THE PROPOSED CHANGE

This amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) as follows:

(i) The amendment involves no significant hazards consideration.

As described in Section IV of this evaluation, the proposed change involves no significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change does not involve the installation of any new equipment, or the modification of any equipment that may affect the types or amounts of effluents that may be released offsite. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

(iii) There is no significant increase in individual or cumulative occupation radiation exposure.

The proposed change does not involve plant physical changes, or introduce any new mode of plant operation. Therefore, there is no significant increase in individual or cumulative occupations radiation exposure.

Based on the above, the Authority concludes that the proposed changes meet the criteria specified in 10 CFR 51.22 for a categorical exclusion from the requirements of 10 CFR 51.22 relative to requiring a specific environmental assessment by the Commission.

VI. CONCLUSION

The proposed changes will not alter assumptions relative to the mitigation of an accident or transient event, and will not adversely affect normal plant operation and testing. The proposed changes are consistent with the current safety analysis assumptions and with the Technical Specifications. As such, no question of safety exists.

The Plant Operating Review Committee (PORC) and the Safety Review Committee (SRC) have reviewed this proposed change to the TS and have concluded that it does not involve a significant hazards consideration and will not endanger the health and safety of the public.

VII. REFERENCES

1. NEI 94-01, "Nuclear Energy Institute Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 0, July 26, 1995.

2. NRC letter to NYPA Issuing Technical Specification Amendment 174, dated June 17, 1997 to implement the requirements of 10 CFR 50, Appendix J, Option B for performance-based primary reactor containment leakage testing. (page 10 of ILRT test results)

3. Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," September 1995.

4. American National Standard ANSI/ANS - 56.8 - 1994, "Containment System Leakage Testing Requirements."

5. NUREG-1493, "Performance-Based Containment Leak-Test Program," Final Report, September 1995.

ATTACHMENT III TO IPN-00-062

MARK-UP OF TECHNICAL SPECIFICATION

PAGES REGARDING THE PROPOSED CHANGE

TO SECTION 6.14 OF THE ADMINISTRATIVE SECTION OF

THE TECHNICAL SPECIFICATIONS

NOTE 1: Additions are shown in **bold**.

NOTE 2: Previous amendment numbers and the revision bars are not shown.

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

6.12.2* In addition to the requirements of 6.12.1 above, areas accessible to individuals with radiation levels such that an individual could receive in 1 hour a dose greater than 1000 mrem**, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the plant Radiological and Environmental Services Manager or his designee.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 Environmental qualification of electric equipment important to safety shall be in accordance with the provisions of 10 CFR 50.49. Pursuant to 10 CFR 50.49, Section 50.49(d), the EQ Master List identifies electrical equipment requiring environmental qualification.

6.13.2 Complete and auditable records which describe the environmental qualification method used, for all electrical equipment identified in the EQ Master List, in sufficient detail to document the degree of compliance with the appropriate equipments of 10 CFR 50.49 shall be available and maintained at a central location. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

6.14 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, Dated September 1995" as modified by the following exceptions:

a. ANS 56.8 - 1994, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

b. NEI 94-01 - 1995, Section 9.2.3: The first Type A test performed after the December 2, 1990 Type A test shall be performed at a frequency of at least once per fifteen years.

The peak calculated primary containment internal pressure, Pa, is 42.40 psig. The minimum test pressure is 42.42 psig.

The maximum allowable primary containment leakage rate, La, at Pa, shall be 0.1% of primary containment air weight per day.

Leakage acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq$ 1.0 La. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 La for the Type B and C tests and $\leq$ 0.75 La for Type A tests;

---

* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

** Measured at 30 centimeters (12 inches) from radiation sources external to the body, or 30 centimeters (12 inches) from any surface that the radiation penetrates.

b. Air lock testing acceptance criteria are:

1) Overall the air lock leakage rate is $\leq$ 0.05 La when tested at $\geq$ Pa,

2) For each door, leakage rate is $\leq$ 0.01 La when pressurized to $\geq$ Pa.

c. Isolation valves sealed with the service water system leakage rate into containment acceptance criterion is $\leq$0.36 gpm per fan cooler unit.

d. Isolation Valve Seal Water System leakage rate acceptance criterion is 14,700 cc/hr at 1.1Pa.

The provisions of Specification 1.12 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program. The provisions of Specification 4.1, "Applicability," as they relate to delay of 24 hours in applying an LCO following the discovery of a surveillance test not performed, are applicable to the Primary Containment Leakage Rate Testing Program.

ATTACHMENT IV TO IPN-00-062

MARK-UP OF IMPROVED TECHNICAL SPECIFICATION TO SHOW EFFECTS OF PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING SECTION 6.14 OF THE ADMINISTRATIVE SECTION OF THE TECHNICAL SPECIFICATIONS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

5.5.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995" as modified by the following exceptions:

ANS 56.8-1994, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

NEI 94-01 - 1995, Section 9.2.3: The first Type A Test performed after the December 2, 1990 Type A test shall be performed no later than December 1, 2005.

The maximum allowable primary containment leakage rate, L_a, at a minimum test pressure equal to P_a, shall be 0.1% of primary containment air weight per day. P_a is the peak calculated containment internal pressure related to the design basis accident.

Leakage acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and C tests and $\leq 0.75\ L_a$ for Type A tests;

b. Air lock testing acceptance criteria are:

   1) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$,

   2) For each door, leakage rate is $\leq 0.01\ L_a$ when pressurized to $\geq P_a$.

c. Isolation Valve Seal Water System leakage rate acceptance criterion is $\leq$ 14,700 cc/hr at $\geq 1.1\ P_a$.

d. Acceptance criterion for leakage into containment from isolation valves sealed with the service water system is $\leq$ 0.36 gpm per fan cooler unit when pressurized at $\geq 1.1\ P_a$. This limit protects the internal recirculation pumps from flooding during the 12-month period of post accident recirculation.

5.5.15 Containment Leakage Rate Testing Program (continued)

The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10CFR50, Appendix J.

The peak calculated containment internal pressure for the design basis main steam line break, Pa, is 42.40 psig. The minimum test pressure is 42.42 psig.

The maximum allowable primary containment leakage rate, La, at Pa, shall be 0.1% of primary containment air weight per day.