UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 9, 1992

Docket No. 50-286

Mr. Ralph E. Beedle
Executive Vice President - Nuclear Generation
Power Authority of the State of New York
123 Main Street
White Plains, New York 10601

Dear Mr. Beedle:

SUBJECT: ISSUANCE OF AMENDMENT FOR INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. M82182)

The Commission has issued the enclosed Amendment No. 111 to Facility Operating License No. DPR-64 for the Indian Point Nuclear Generating Unit No. 3. The amendment consists of changes to the Technical Specifications (TS) in response to your application transmitted by letter dated November 15, 1991.

The amendment revises TS Section 4.11 (Safety-Related Shock Suppressors (Snubbers)) to specify a snubber visual inspection schedule which is in accordance with the guidance provided in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." The amendment also corrects typographical errors in TS Section 4.11.

A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

N. F. Conicella

Nicola F. Conicella, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 111 to DPR-64
2. Safety Evaluation

cc w/enclosures:
See next page

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Mr. Ralph E. Beedle
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of New York

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

POWER AUTHORITY OF THE STATE OF NEW YORK

DOCKET NO. 50-286

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 111
License No. DPR-64

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Power Authority of the State of New York (the licensee) dated November 15, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-64 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 111, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A. Capra, Director
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical Specifications

Date of Issuance: March 9, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 111

FACILITY OPERATING LICENSE NO. DPR-64

DOCKET NO. 50-286

Revise Appendix A as follows:

Remove Pages	Insert Pages
4.11-1	4.11-1
4.11-2	4.11-2
4.11-3	4.11-3
4.11-4	4.11-4
4.11-5	4.11-5
4.11-6	4.11-6
-------	4.11-7

4.11 SAFETY-RELATED SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to the periodic inspection and testing requirements for all safety-related hydraulic snubbers that are required to protect the primary coolant system or any other safety-related system or component.

Objective

To verify that safety-related snubbers will perform their design functions in the event of a seismic or other transient dynamic event.

Specification

A. Visual Inspection

1. Safety-related snubbers shall be visually inspected in accordance with the following schedule:

Size of Population or Category (Notes 1 & 2)	Number Of Unacceptable Snubbers		
	Column A Extend Interval (Note 3)	Column B Repeat Interval (Note 4)	Column C Reduce Interval (Note 5)
1	0	0	1
20	0	0	1
40	0	0	1
60	0	0	1
80	0	0	2
90	0	0	3
100	0	1	4
120	0	1	5
130	0	2	6
140	0	2	7
150	0	3	8
160	0	3	9
170	0	3	10
180	1	4	11
190	1	4	12
200	2	5	13

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. This decision shall be made and documented before any inspection and shall be used as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. The next lower integer for the value of the limit for Columns A, B, C shall be used if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B, but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C, but greater than the number in Column B, the next interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Column B and C.

2. Visual inspection shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, and (2) attachments to the foundations or supporting structure are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for the particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.11.B.5. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable via functional testing for the purpose of establishing the next visual inspection period. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

B. Functional Testing

1. At least once per 18 months during plant shutdown, a representative sample of 10% of all the safety-related hydraulic snubbers shall be functionally tested for operability, either in place or on a bench test. For each snubber that does not meet the requirement of 4.11.B.5, an additional 10% of the total installed of that type of hydraulic snubber shall be functionally tested. This additional testing will continue until no failures are found or until all snubbers of the same type have been functionally tested. The representative sample shall include each size and type of snubber in use in the plant.

2. The representative sample selected for functional testing should include the various configurations, operating environments, sizes and capacities of snubbers. At least 25% or the maximum possible if less than 25%, of the snubbers in the representative sample should include snubbers from the following three categories:

   a. The first snubber away from each reactor vessel nozzle.

b. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)

c. Snubbers within 10 feet of the discharge from a safety or relief valve.

Snubbers identified as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative samples*.

Snubber selection for functional testing is developed from an engineering evaluation and is based on a rotating basis. In addition to the regular sample, snubber locations which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the previously failed snubber (if it is repaired and currently installed in another position) and the installed spare snubber shall be retested. Test results of these snubbers may not be included for the sampling required by Specification 4.11.B.1.

3. If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same manufacturer and model, subject to the same defect and located in a similar environment, shall be functionally tested.

4. For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the inoperable snubber(s) remain capable of performing their intended function in their intended manner after the action statements of Specification 3.13.2.a or 3.13.3 a were performed as necessary.

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* Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions.

5. The hydraulic snubber functional test shall verify that:

   a. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

   b. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

C. Snubber Service Life Monitoring

1. A record of the service life of each snubber, the date at which the designated service life commences, as well as the installation and maintenance records on which the designated service life is based shall be maintained as required by specification 6.10.2.o. The service life may be modified based on a performance evaluation.

2. At least once per operating cycle the installation and maintenance records for each safety-related snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This re-evaluation, replacement or reconditioning shall be indicated in the records.

Basis

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Performance of periodic visual inspections of snubbers complements the existing functional testing and provides additional confidence in snubber operability. The visual inspection interval for the snubbers is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various populations or categories and may be as long as two refueling cycles with good overall visual inspection results. The visual inspection interval will not exceed 48 months. However, as for all surveillance activities, unless otherwise noted, allowable tolerances of 25% are applicable for snubbers. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The words "will not exceed" associated with a surveillance interval does not negate this allowable tolerance. Inspections performed before the interval has elapsed may be used as a new reference point to determine the next scheduled inspection; however, the results of such early

inspections performed before the original required time interval has elapsed may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule. The results of random inspections of individual snubbers, conducted at other than scheduled inspection intervals, will be evaluated on a case-by-case basis to determine if they should impact the scheduled interval.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified operable by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, and are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system by determining if the system or component was exposed to a dynamic transient which required the inoperable snubber to mitigate the transient.

To provide assurance of snubber functional reliability, a representative sample of 10% of the installed snubbers will be functionally tested during plant shutdowns. The representative sample selected for functional testing includes various configurations, operating environments, locations and the range of size and capacity of snubbers. An engineering evaluation which addresses snubber performance environments and history selects the representative sample which is based on a rotating basis. Selection of a representative sample of hydraulic snubbers provides a confidence level within acceptable limits that these supports will be in an operable condition. Observed failures of these sample snubbers shall require functional testing of additional units of the same type.

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If a snubber fails a functional test, that snubber location will be retested during the next snubber testing period to determine if the failure was environmentally caused. If the failed snubber was repaired and re-installed elsewhere in the system, during the functional test effort the snubber will be retested during the next testing period to verify if the repair addressed the cause of a failure. If a failed snubber is repaired and not reinstalled in the system during the functional test effort it shall be retested before it is subsequently installed in the system as added assurance that the repair addressed the cause of failure. The results of these augmented testing efforts are intended to address previous failure modes and these test results (passing or failure) may not be included in the specification 4.11.B.1 sample selection.

The service life of a snubber is evaluated via engineering evaluation, test data, service data, manufacturer input, snubber service conditions and snubber service history (newly installed snubber, seal replaced, spring replaced, in high radiation area, high temperature area, etc....). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

References

1) Generic Letter 84-13, "Technical Specifications For Snubbers."

2) Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions."

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. DPR-64

POWER AUTHORITY OF THE STATE OF NEW YORK

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

DOCKET NO. 50-286

1.0 INTRODUCTION

By letter dated November 15, 1991, the Power Authority of the State of New York (the licensee) submitted a request for changes to the Indian Point Nuclear Generating Unit No. 3, Technical Specifications (TS). The requested changes would revise TS Section 4.11 (Safety-Related Shock Suppressors (Snubbers)) to specify a snubber visual inspection schedule which is in accordance with the guidance provided in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." The changes also correct typographical errors in TS Section 4.11.

2.0 EVALUATION

The TS impose surveillance requirements for functional testing and visual inspection of all safety-related snubbers. The objective of these surveillances is to ensure that the safety-related snubbers will perform their design function in the event of a seismic or other transient dynamic event. Functional testing provides a 95 percent confidence level that 90 percent to 100 percent of the snubbers operate within the specified acceptance limits. Visual examination is a separate process that compliments the functional testing program and provides additional confidence in snubber operability.

The licensee states that the current TS specifies a snubber visual inspection schedule for an 18-month operating cycle and does not take into account a 24-month operating cycle. The licensee will commence operating on a 24-month operating cycle after the cycle 8/9 refueling outage is completed (June 1992). The licensee also states that the current snubber visual inspection schedule is based only on the number of inoperable snubbers found during the previous visual inspection and does not take into account the size of the snubber population inspected.

A similar situation is applicable to a number of licensees. To alleviate this situation, on December 11, 1990, the NRC staff issued Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions." In the generic letter, the staff developed an alternative schedule for snubber visual inspections that maintains the same

confidence level as the existing schedule. The alternative inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the size of the specific snubber population or category inspected. In addition, the alternative inspection interval is based on an operating cycle of up to 24 months and may be as long as 48 months, depending on the number of unacceptable snubbers found during the previous visual inspection.

The licensee's submittal states that the proposed changes are in accordance with the guidance provided in Generic Letter 90-09. Specifically, the licensee's submittal specifies a schedule for visual inspection of snubbers that is based on the number of unacceptable snubbers found during the previous inspection, the total population or category size for each snubber type, and the previous inspection interval. The submittal also states that the proposed inspection interval is applicable to a 24-month operating cycle and the interval may be increased to every other refueling outage (48 months), as long as good overall visual inspection results are obtained. The staff has reviewed the licensee's proposed TS changes and has concluded that the changes are in accordance with the guidance provided in Generic Letter 90-09. Therefore, the staff finds the proposed changes acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 66928). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor:
N. Conicella

Date: March 9, 1992

March 9, 1992

Docket No. 50-286

DISTRIBUTION:
See attached sheet

Mr. Ralph E. Beedle
Executive Vice President - Nuclear Generation
Power Authority of the State of New York
123 Main Street
White Plains, New York 10601

Dear Mr. Beedle:

SUBJECT: ISSUANCE OF AMENDMENT FOR INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. M82182)

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A copy of the related Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,
Original Signed By
Nicola F. Conicella, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 111 to DPR-64
2. Safety Evaluation
cc w/enclosures:
See next page

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DATE	: 2/6/92 2/11/92 3/9/92	:2/11/92	:2/12/92	:3/9/92	: /92

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DATED: March 9, 1992

AMENDMENT NO. 111 TO FACILITY OPERATING LICENSE NO. DPR-64-INDIAN POINT UNIT 3

Docket File
NRC & Local PDRs
PDI-1 Reading
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J. Calvo, 14/A/4
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N. Conicella
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OGC-WF
D. Hagan, 3302 MNBB
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PD Plant-specific file [Gray File]

cc: Plant Service list