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Michael R. Kansler
Senior Vice President &
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October 23, 2001
IPN-01-074

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

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed Change to Technical Specifications Regarding
Elimination of Requirement for a Post Accident Sampling System**

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications proposes to delete Technical Specification 5.5.3, "Post Accident Sampling" and thereby eliminate the requirements to have and maintain the Post Accident Sampling System. This proposed change is based on the NRC approved Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process.

Enclosed for filing by Entergy Nuclear Operations, Inc (ENO) is the signed original of a document entitled, "Application for Amendment to Operating License." Attachment I to this application is the proposed new Technical Specification and Attachment II is the supporting Safety Evaluation. A markup of the existing Technical Specification page showing the proposed change is provided in Attachment III, for information only. There are no Bases changes associated with this proposed amendment.

In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

There are three new regulatory commitments, summarized below, made in this submittal. The status of each commitment is stated in Attachment IV.

- Maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere.
- Maintain capability for classifying fuel damage events at the Alert level threshold.
- Maintain the capability to monitor radioactive iodines released to the offsite environs.

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These new commitments will be administratively controlled under the existing commitment management program. ENO requests an implementation date of 90 days from the date of the amendment.

If you have any questions regarding this submittal, please contact Mr. John Donnelly at (914) 736-8310.

Very truly yours,



Michael R. Kansler
Senior Vice President &
Chief Operating Officer

cc:

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BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of
ENTERGY NUCLEAR OPERATIONS, INC.
Indian Point Nuclear Generating Unit No. 3

)
) Docket No. 50-286
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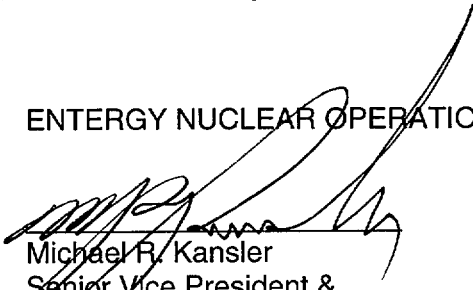
APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Entergy Nuclear Operations, Inc. (ENO), as holder of Facility Operating License No. DPR-64, hereby applies for an Amendment to the Technical Specifications (TS) contained in Appendix A of the license.

This application for amendment to the Indian Point 3 Technical Specifications proposes to delete Technical Specification 5.5.3, "Post Accident Sampling" and thereby eliminate the requirements to have and maintain the Post Accident Sampling System. This proposed change is based on the NRC approved Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process.

Attachments I to this application contains the proposed new Technical Specification and Attachment II is the supporting Safety Evaluation. A markup of the existing Technical Specification page showing the proposed change is provided in Attachment III, for information only.

ENTERGY NUCLEAR OPERATIONS, INC.


Michael R. Kansler
Senior Vice President &
Chief Operating Officer

STATE OF NEW YORK
COUNTY OF WESTCHESTER

Subscribed and sworn to before me
This 23rd day of October 2001.

Notary Public



DOREEN COSTABILE
Notary Public, State of New York
Registration No. 01CO5034831
Qualified in Putnam County
Commission Expires October 17, 2002

ATTACHMENT I TO IPN-01-074

**PROPOSED TECHNICAL SPECIFICATION REGARDING
ELIMINATION OF REQUIREMENT FOR A POST ACCIDENT SAMPLING SYSTEM**

Remove Page

5.0-9

Insert Page

5.0-9

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

5.5 Programs and Manuals

5.5.3 NOT USED

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

(continued)

ATTACHMENT II TO IPN-01-074

**SAFETY EVALUATION FOR
PROPOSED TECHNICAL SPECIFICATION CHANGE REGARDING
ELIMINATION OF REQUIREMENT FOR A POST ACCIDENT SAMPLING SYSTEM**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64**

Section I - Description of Proposed Changes

The change proposed by Entergy Nuclear Operations, Inc (ENO) will eliminate the requirements that are stated in Technical Specification 5.5.3 for a Post Accident Sampling System (PASS). Section number 5.5.3 will be retained and will be labeled as 'NOT USED' so that subsequent sections do not need to be renumbered.

Section II - Purpose of Proposed Changes

The proposed amendment adopts Standard Technical Specification Change Traveler, TSTF-366 (Reference 1). The availability of this Technical Specification improvement was announced in the Federal Register (Reference 2) on October 31, 2000 as part of the Consolidated Line Item Improvement Process (CLIIP). TSTF-366 also addresses the possible need for a revision to Technical Specification 5.5.2, "Primary Coolant Sources Outside Containment." However, this change is not applicable to Indian Point 3 because physical changes to plant systems are not required or planned for implementation of the proposed PASS elimination amendment. The proposed amendment also does not result in any changes to the Technical Specification Bases for Indian Point 3.

Section III - Safety Implication of Proposed Changes

Westinghouse Owners Group (WOG) topical report WCAP-14986-A (Reference 3) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance and emergency plans. The topical report concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated. ENO has reviewed the topical report and the associated NRC Safety Evaluation to confirm the applicability to Indian Point 3.

Regarding elimination of PASS sampling for containment atmosphere hydrogen concentration, Indian Point 3 is subject to the requirement specified in NUREG-0737, Item II.F.1 for monitors to be functional within 30 minutes of the initiation of safety injection. This requirement was not invoked by a confirmatory order so that methods other than a revision to a confirmatory order, such as an evaluation under 10 CFR 50.59, may be used to modify this timing requirement. Consistent with the NRC Safety Evaluation (Section 3.9), ENO will use information provided in the topical report together with consideration of plant-specific emergency action levels, Emergency Operating Procedures, and Severe Accident Management Guidelines to establish an appropriate plant-specific time limit for placing the containment hydrogen monitors in service.

Regarding elimination of PASS sampling for containment sump pH, Indian Point 3 is a brackish water plant that does not have more than a single barrier between the cooling water and the containment and does not have passive pH control. Therefore, consistent with the NRC Safety Evaluation (Section 3.13), Indian Point 3 will implement a means of estimating sump pH to determine the need for pH adjustment, until such time that a passive pH control method is installed.

Section IV Evaluation of Significant Hazards Consideration

ENO has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. ENO has concluded that the proposed determination in the notice is applicable to Indian Point 3 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

As discussed in the notice of availability published in the Federal Register dated October 31, 2000, for this Technical Specification improvement, plant-specific verifications were performed as follows:

1. ENO currently has and will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. Chemistry procedures exist to implement these contingency plans.
2. ENO currently has and will maintain the capability for classifying fuel damage events at the Alert level threshold at 300 microcuries / cc dose equivalent iodine. This capability is described in the Emergency Plan implementing procedures.
3. ENO currently has and will maintain the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in the Emergency Plan implementing procedures.

The above items are considered by ENO to be regulatory commitments that will be administratively controlled under the existing commitment management program.

Section V - Environmental Evaluation

ENO has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. ENO has determined that the staff's findings presented in that evaluation are applicable to Indian Point 3 and the evaluation is hereby incorporated by reference for this application.

Section VI – References

1. Standard Technical Specification Change Traveler TSTF-366 Rev 0, "Elimination of Requirements for a Post Accident Sampling System."
2. Federal Register Notice, 65 FR 65018, "Notice of Availability in Referencing in License Application Amendments -- Model Safety Evaluation," October 31, 2000.
3. WCAP-14986-A, Revision 2, "Westinghouse Owners Group, Post Accident Sampling System Requirements: A Technical Basis," July 2000. (NRC Safety Evaluation of WCAP-14986, dated June 14, 2000 is incorporated in this document)

ATTACHMENT III TO IPN-01-074

**MARKED PAGES FOR
PROPOSED TECHNICAL SPECIFICATION CHANGE REGARDING
ELIMINATION OF REQUIREMENT FOR A POST ACCIDENT SAMPLING SYSTEM**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64**

5.5 Programs and Manuals

5.5.3 Post Accident Sampling NOT USED

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions.~~

~~The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~
- ~~c. Provisions for maintenance of sampling and analysis equipment.~~

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

(continued)

ATTACHMENT IV TO IPN-01-074

LIST OF COMMITMENTS

COMMITMENT	STATUS
ENO currently has and will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. Chemistry procedures exist to implement these contingency plans.	Complete
ENO currently has and will maintain the capability for classifying fuel damage events at the Alert level threshold at 300 :Ci / cc dose equivalent iodine. This capability is described in the Emergency Plan implementing procedures.	Complete
ENO currently has and will maintain the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in the Emergency Plan implementing procedures.	Complete