Entergy

Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
P.O. Box 308
Buchanan, NY 10511
Tel 914 736 8001
Fax 914 736 8012

Robert J. Barrett
Vice President, Operations
Indian Point 3

IPN-02-025
April 9, 2002

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
License No. DPR-64
Revision to Inservice Testing Program Relief Request VR-3 and VR-4

Reference: 1. Indian Point 3 Letter to the NRC "Relief Request VR-3 and VR-4 For Inservice Testing Program," dated December 11, 2001 (IPN-01-088).

Dear Sir:

The purpose of this letter is to transmit two requests for relief under the Inservice Testing Program. These requests, originally transmitted in Reference 1, have been revised, as indicated by margin bars, to include additional information discussed with the NRC Staff on February 6, 2002. Relief request VR-3 was revised to identify the specific valves that would be incorporated into the relief request and to note compliance with the requirement for more frequent testing where adverse conditions exist. Relief request VR-4 was revised to identify how the alternative testing program would comply with the criteria of Draft Regulatory Guide DG-1089, December 2001, and ASME Code Case OMN-12. These revised relief requests demonstrate that the proposed alternatives would provide an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

There are no new commitments made by this letter. If you have any questions, please contact Mr. John Donnelly.

Very truly yours,

Robert J. Barrett
Vice President - Operations
Indian Point 3 Nuclear Power Plant

cc: next page

A047

Attachment as stated

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

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
295 Broadway, Suite 3
P.O. Box 337
Buchanan, NY 10511-0308

Mr. Patrick Milano, Project Manager
Project Directorate I
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop O 8 C2
Washington, DC 20555

Mr. Paul Eddy
NYS Department of Public Service
3 Empire Plaza
Albany, NY 12223

RELIEF REQUEST NO. VR-3 (Page 1 of 2)

SYSTEM:

River Water, Safety Injection, Closed Cooling Water, Residual Heat Removal

VALVES:

Sixty Four Manual Valves Currently Stroked at a Quarterly Frequency as follows:

ISI-20333	FCV-1111, FCV-1112, SWN-4 thru 7
ISI-20413	MS-34-4, MS-34-5, MS-34-7, MS-34-9, MS-34-10, MS-37-1, MS-37-2, MS-67-1 thru MS-67-4
ISI-27223	SWN-41-1 thru SWN-41-5, SWN-44-1 thru SWN-44-5, SWN-51-1 thru SWN-51-5, SWN-71-1 thru SWN-71-5, SWN-108-3, SWN-108-6, SWN-29 thru 32, SWN-33-1, SWN-33-2, SWN-38, SWN-39, SWN-62-1, SWN-62-2, SWN-94-1, SWN-94-2
ISI-27503	1807B, 898, 869A, 869B
ISI-27513	701A, 701B, 759C, 759D, 766A thru D, 732

Seven Manual Valves Currently Stroked at a Cold Shutdown Frequency

ISI-27223	SWN-40-1, SWN-40-2
ISI-27503	846
ISI-27513	756A, 756B, 810, 814

CATEGORY:

A, B

FUNCTIONS:

These manual valves are used to align components to separate headers, for cross-tie and isolation capability, and containment isolation among other uses.

RELIEF REQUEST NO. VR-3 (Page 2 of 2)

REQUIREMENTS:

Active Category A and B manual valves shall be tested nominally every 3 months, except as provided by paragraphs 4.2.1.2, 4.2.1.5, and 4.2.1.7 per OM-10, 1988 Addenda to OM-1987, Paragraph 4.2.1.1.

BASIS FOR RELIEF:

The extension of exercising manual valves from every quarter to every 5 years has been evaluated by the OM code committee, found acceptable, and incorporated into the 1999 Addenda and 2000 Addenda of the OM code. The NRC has proposed to change 10CFR50.55(a) to allow testing of manual valves at a 2 year interval as a proposed modification to the 1999 Addenda and 2000 Addenda of the ASME OM Code. In Federal Register Vol. 66, No. 150 / Friday, August 3, 2001 the NRC proposed allowing the extension of test interval for manual valves from every 3 months to every 2 years.

ALTERNATIVE TESTING:

These manual valves will have an exercise interval of 2 years provided that adverse conditions do not require more frequent testing. This is consistent with the information contained in the proposed rulemaking of 10CFR50.55(a) contained in the Federal Register / Vol. 66, No. 150 dated August 3, 2001.

RELIEF REQUEST NO. VR-4 (Page 1 of 2)

SYSTEM:

Main Steam (Dwg. No. ISI-20173)

VALVE:

MS-PCV-1139

CATEGORY:

B

FUNCTIONS:

This air operated valve (AOV) opens on LO-LO steam generator level, AMSAC and loss of 480 volt offsite power to provide a flowpath for steam (and control of steam flow) to auxiliary feedwater pump 32 turbine. It trips closed on pump/turbine overspeed and fails open on loss of pneumatic (air) pressure. In the event of a loss of air this valve can be manually positioned to regulate turbine steam supply pressure.

This valve reduces the main steam supply pressure to the turbine driven auxiliary feedwater pump to approximately 600 psig during normal and accident conditions.

REQUIREMENTS:

OM-10, Section 4.2.1.4 requires that the stroke times ofall power operated valves shall be measured to at least the nearest second.

BASES FOR RELIEF:

This valve is a control valve with a safety function as discussed in NUREG-1482, Section 4.2.9. As discussed in the NRC recommendation, alternative methods of monitoring the valve for degrading conditions may be acceptable in lieu of stroke timing.

ALTERNATE TESTING:

MS-PCV-1139 is a High-Risk AOV (Category 1) in the IP3 AOV Program and requires periodic testing using AOV Diagnostics. As an alternative to stroke timing, this valve will be diagnostically tested at least every 2 years using an AOV diagnostic system which is capable of monitoring the valve for degrading conditions. The testing will be in accordance with the requirements of Paragraph 4 of Code Case OMN-12 and Conditions 1, 2, and 4 of Draft Regulatory Guide DG-1089. In addition, during the quarterly surveillance performed on the

RELIEF REQUEST NO. VR-4 (Page 2 of 2)

turbine driven auxiliary feedwater pump, the valve will be verified to be controlling the pump properly.