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Michael R. Kansler
President

March 09, 2004
NL-04-025

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

SUBJECT: Indian Point Nuclear Generating Unit No. 3
Docket No. 50-286
**APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT
TO EXTEND THE COMPLETION TIME FOR CONDITION B OF
TECHNICAL SPECIFICATION 3.5.1, "ACCUMULATORS," USING
THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

Dear Sir:

In accordance with the provisions of 10 CFR 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Entergy Nuclear Operations, Inc. (ENO) is submitting a request for an amendment to the technical specifications (TS) for Indian Point 3.

The proposed amendment would extend the completion time from 1 hour to 24 hours for Condition B of Technical Specification (TS) 3.5.1, "Accumulators." The change is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this technical specification improvement was announced in the Federal Register on March 12, 2003 as part of the consolidated line item improvement process (CLIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides the existing TS Bases pages marked-up to reflect the proposed change (for information only).

ENO requests approval of the proposed license amendment by September 10, 2004, with the amendment being implemented within 60 days of approval.

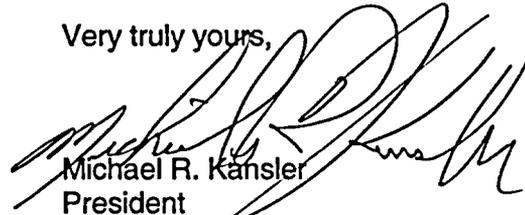
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In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated New York State Official.

There are no new commitments identified in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 03/09/04

Very truly yours,



Michael R. Kansler
President
Entergy Nuclear Operations, Inc.

- Attachments: 1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Up)
3. Proposed Technical Specification Bases Changes (Mark-Up)

cc:

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ATTACHMENT 1

**APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT
TO EXTEND THE COMPLETION TIME FOR CONDITION B OF
TECHNICAL SPECIFICATION 3.5-1, "ACCUMULATORS", USING
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DESCRIPTION AND ASSESSMENT

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 3
DOCKET NO. 50-286**

Attachment 1

Description and Assessment

1.0 DESCRIPTION

The proposed License amendment extends the completion time from 1 hour to 24 hours for Condition B of Technical Specification (TS) 3.5.1, "Accumulators."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-370, "Risk Informed Evaluation of an Extension to Accumulator Completion Times for Westinghouse Plants." The availability of this technical specification improvement was announced in the Federal Register on March 12, 2003 as part of the consolidated line item improvement process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Nuclear Operations Inc. (ENO), has reviewed the safety evaluation published on July 15, 2002 (67 FR 46542) as part of the CLIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-370 (i.e., WCAP-15049-A, "Risk-Informed Evaluation of an Extension to Accumulator Completion Times," dated May 18, 1999). ENO has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Indian Point 3 and justify this amendment for the incorporation of the changes to the Indian Point 3 Technical Specifications.

2.2 Optional Changes and Variations

ENO is not proposing any variations or deviations from the technical specification changes described in TSTF-370 or the NRC staff's model safety evaluation published on July 15, 2002.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

ENO has reviewed the proposed no significant hazards consideration determination published on July 15, 2002 (67 FR 46542) as part of the CLIIP. ENO has concluded that the proposed determination presented 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).

3.2 Verification and Commitments

There are no new regulatory commitments associated with this proposed change.

4.0 ENVIRONMENTAL EVALUATION

ENO has reviewed the environmental evaluation included in the model safety evaluation published on July 15, 2002 (67 FR 46542) and as part of the CLIIP. ENO has concluded that the NRC staff's findings presented in that evaluation are applicable to Indian Point 3 and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2

**APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT
TO EXTEND THE COMPLETION TIME FOR CONDITION B OF
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PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

TS PAGE

3.5.1.1

**ENERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 3
DOCKET NO. 50-286**

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,
MODE 3 with reactor coolant system pressure > 1000 psig.

- NOTES-----
1. In MODE 3, all accumulator discharge isolation valves may be closed and energized for up to 8 hours during the performance of reactor coolant system hydrostatic testing.
 2. In MODE 3, one accumulator discharge isolation valve may be closed and energized for up to 8 hours for accumulator check valve leakage testing.
-

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits of SR 3.5.1.4.	A.1 Restore boron concentration to within limits of SR 3.5.1.4.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours (24)

(continued)

ATTACHMENT 3

**APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT
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PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (MARK-UP)

BASES PAGES

**B 3.5.1-7
B 3.5.1-9
B 3.5.1-10**

**ENERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 3
DOCKET NO. 50-286**

BASES

ACTIONS

A.1 (continued)

the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analysis techniques demonstrate that the accumulators do not discharge following a large main steam line break. Even if they do discharge, their impact is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

B.1

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 24 hours. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 24 hour Completion Time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions.

24

24

The 24 hours allowed to restore an inoperable accumulator to OPERABLE status is justified in WCAP-15049-A, Rev. 1 (Ref. 8).
C.1 and C.2

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and reactor coolant pressure reduced to ≤ 1000 psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.1.4 (continued)

inleakage. Sampling the affected accumulator within 6 hours after an increase of 8.4 cubic feet will identify whether inleakage has caused a reduction in boron concentration to below the required limit. Considering the nominal accumulator volume of 795 cubic feet of water, inleakage of 8.4 cubic feet of pure water would result in a boron concentration reduction of approximately 1%. An increase in the accumulator volume of 8.4 cubic feet causes a change of approximately 10% in the indicated accumulator level. It is not necessary to verify boron concentration if the added water inventory is from the refueling water storage tank (RWST), because the water contained in the RWST is within the accumulator boron concentration requirements. This is consistent with the recommendation of NUREG-1366 (Ref. ^(A)).

SR 3.5.1.5

Verification every 31 days that power is removed from each accumulator discharge isolation valve operator when the reactor coolant system pressure is ≥ 2000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, only two accumulators would be available for injection given a single failure coincident with a LOCA. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

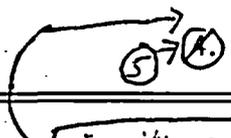
This SR allows power to be supplied to the motor operated discharge isolation valves when reactor coolant system pressure is < 2000 psig, thus allowing operational flexibility by avoiding unnecessary delays to manipulate the breakers during plant startups or shutdowns. Should closure of a valve occur, the SI signal provided to the valves would open a closed valve in the event of a LOCA.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Chapter 6.
2. 10 CFR 50.46.
3. FSAR, Chapter 14.
4. NUREG-1366, February 1990.



4. WCAP-15049-A, Rev. 1, April 1999.