

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

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


APPLICATION FOR AMENDMENT TO
OPERATING LICENSE

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

The proposed changes to the Indian Point 3 Technical Specifications serve to amend certain Sections of Appendix A to the Operating License, which were previously deferred in the Authority's September 29, 1980 letter (IPN-80-89), to be consistent, where appropriate and where possible, with portions of the Westinghouse Standard Technical Specifications (W-STs), pursuant to the Commission's July 7, 1980 letter.

The proposed changes to the Technical Specifications are presented in Attachment I to this Application. The Safety Evaluation is included in Attachment II.

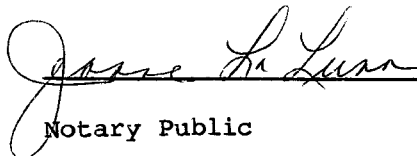
POWER AUTHORITY OF THE STATE
OF NEW YORK

By 
J. P. Bayne
Executive Vice President
Nuclear Generation

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PDR

State of New York
County of Westchester

Subscribed and Sworn to before
me this 29 day of Dec. 1983


Notary Public

JEANNE LA LUNA
NOTARY PUBLIC, STATE OF NEW YORK
NO. 60-4614305
QUALIFIED IN WESTCHESTER COUNTY
TERM EXPIRES MARCH 30th 1985.....

ATTACHMENT A

Discussion of Deficiencies

(Numbers in parentheses are W-STS Numbers)

IP-3 T/S

3.6.C Revise to indicate a maximum temperature during operations. (3/4.6.1.6)

RESPONSE:

The Authority has installed six temperature sensors inside containment to provide for containment temperature monitoring during normal operations. These sensors will be tested under those normal operating conditions resulting in the highest obtainable ambient containment temperature. The empirical data obtained from these tests will be utilized to develop an appropriate Technical Specification (T/S) for maximum average containment temperature.

IP-3 T/S

4.5.A.4 Revise to require filter testing as required in
4.5.A.5 W-STS (4.6.3, 4.7.7, and 4.9.12) and include
and 4.5.A.6 similar testing requirements for any other ESF filter systems.

RESPONSE:

The Authority is proposing changes to the subject T/S's that provide for additional filter testing, where applicable, to address the corresponding W-STS. It should be noted that there are no other ESF filter systems existing at Indian Point 3 that are not already covered by the current T/S's.

IP-3 T/S

4.6.B Upgrade the battery testing to the requirements shown in the W-STS (4.8.2.3.1 and 2)

RESPONSE:

The battery testing surveillance requirements are being upgraded to address the surveillance requirements specified in the W-STS. The Authority has taken exception to certain of the specific W-STS requirements and has not included the quantitative acceptance criteria in the proposed T/S's as suggested by W-STS. The Authority maintains that such details are the subject of the specific test procedures to be followed in implementing the T/S's and proposes to incorporate these details into applicable test procedures upon NRC approval and issuance of the proposed T/S's. It should be noted that the

T/S's proposed in Section 4.6.B are based in part on the recommended surveillance cited in the October 28, 1980 report by the IEEE Working Group on Batteries, Station Design Subcommittee, Power Generation Committee entitled: "Recommended Surveillance and Action Requirements for Large Lead Storage Batteries at Nuclear Power Generating Stations" as well as the corresponding W-STS.

IP-3 T/S

4.6.X Add surveillance requirements for all required distribution systems.

RESPONSE:

The Authority is proposing an additional T/S which will provide surveillance requirements for the Auxiliary Electrical Systems.

Additional Areas of Concern

The following areas should be covered by appropriate LCO's and Surveillance Requirements:

1. Instrumentation for: (a) Remote Shutdown (3/4.3.3.5)
(b) Post Accident (3/4.3.3.6)
(c) Chlorine Detection (3/4.3.3.7)
2. Turbine Overspeed (3/4.3.4)
3. Electrical Equipment Protection Devices
 - a. Containment Penetration Protection (3/4.8.3.1)
 - b. Motor Operated Valves Thermal Overloads (3/4.8.3.2)

RESPONSE:

1. (a) Appropriate LCO's and surveillance requirements are being proposed for the remote shutdown monitoring instrumentation currently existing at IP-3.
- (b) Addition of Boric Acid Storage Tanks Levels to Table 3.5-5 ("Table of Indicators and/or Recorders Available to the Operator") of the IP-3 T/S are being proposed. With this addition, all present monitoring instrumentation available at IP-3 required by W-STS 3/4.3.3.6 is covered under Section 3.5 and 4.1 precluding the need for an additional T/S on Accident Monitoring Instrumentation.
- (c) The Authority will provide a response to this item in accordance with the schedule established in our February 15, 1983 letter (IPN-83-13) for NUREG-0737, Item III.D.3.4. ("Control Room Habitability").

2. The Authority maintains that existing T/S's 3.4.C and 4.1.A (per Item 21 in Table 4.1-1) provide sufficient turbine overspeed protection and surveillance and thus preclude the need for any additional T/S.
- 3.(a) The Authority maintains that a T/S on containment penetration conductor overcurrent protective devices is an unwarranted burden on the plant and that the current practices at IP-3 which include periodic maintenance and testing of relays and breakers are sufficient to obviate the need for a T/S. No T/S is therefore proposed.
- (b) The Authority has evaluated this area and has concluded that a T/S for the motor-operated valve thermal overload protection devices currently existing at IP-3 is not appropriate. Thus, no T/S is proposed. These devices, which are similar to devices used in other nuclear power plants, are of the non-adjustable type which precludes their calibration. In addition, the temperature compensated design of these devices precludes their testing since their removal would be required to facilitate such testing. The W-STS are readily applied only to newer thermal overload protection devices which are of the adjustable type and can be tested in-place.