



**New York Power
Authority**

IPN-84-60
December 3, 1984

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
"Operability" Technical Specifications

- References:
- 1) Letter from S.A. Varga to J.P. Bayne dated October 22, 1984 entitled: "Operability Technical Specification for the Indian Point Nuclear Generating Plant, Unit No. 3 (IP-3)"
 - 2) Letter from D.G. Eisenhut to all Power Reactor Licensees dated April 10, 1980
 - 3) Letter from P.J. Early to S.A. Varga dated May 23, 1980 (IPN-80-50) entitled: "Proposed Change To The Term Operable"
 - 4) Letter from S. A. Varga to G.T. Berry dated September 5, 1980.

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating Licensee," together with forty (40) copies of Attachment I and II thereto, comprising the appropriate revisions to the affected Technical Specifications pages and the associated Safety Evaluation. This application seeks to amend Appendix A, Section 3.7 to define the Limiting Conditions for Operation (LCO) of systems, subsystems, trains, components and devices supplied by an inoperable normal or emergency power source, as provided by the Standard Technical Specifications.

Reference 1 served to notify the Authority that the generic issue of the term "operable" as it applies to the single failure criterion for safety systems, is being re-opened for Indian Point 3. This generic issue of the term "operable" was initially raised in Reference 2. Reference 2 requested technical

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specifications in the following three areas: (1) definition of "operable," (2) LCOs for circumstances which are in excess of those addressed in Technical Specifications, and (3) LCOs for inoperable emergency power sources. The Authority's response to this request was transmitted via Reference 3.

Reference 4 served to transmit Amendment 32 to the Indian Point 3 Facility Operating License which revised the definition of the term "operable" to reflect the Model Technical Specifications enclosed with Reference 2. Reference 1 considers this portion of the Authority's response to be complete.

Reference 3 stated that the LCOs for circumstances which are in excess of those addressed in the Technical Specifications, are presently satisfied by the first paragraph of Section 3 of the Indian Point 3 Technical Specifications. However, Reference 1 states that "This paragraph does not address prompt shutdown requirements; i.e., the unit shall be placed in hot standby within one hour, hot shutdown within 6 hours, and in cold shutdown within 30 hours." It should be noted that the prompt shutdown requirements for safety equipment at Indian Point 3, are included in the technical specification for that piece of equipment. The immediate shutdown requirement provided by Technical Specification Section 3 is invoked if the minimum allowable LCO is violated. If an equipment out-of-service time is not specified for a component identified by an LCO, the out-of-service time is assumed to be zero and the applicable prompt shutdown requirements are invoked. An example of a circumstance necessitating the invocation of Technical Specification Section 3 is as follows:

Technical Specification 3.3.A.3 provides limitations on the Safety Injection and Residual Heat Removal Systems, which stipulate, in part, that the reactor shall not exceed 350°F unless, three safety injection pumps together with their associated piping and valves are operable. Technical Specification 3.3.A.4 states that Technical Specification 3.3.A.3 may be modified to allow one safety injection pump to be out of service provided the pump is restored to an operable status within 24 hours and the remaining two pumps are demonstrated to be operable. Technical Specification 3.3.A.5 states that if the Safety Injection and Residual Heat Removal Systems are not restored to meet the requirements of 3.3.A.3 within the time periods specified in 3.3.A.4, then if the reactor is critical, it shall be in the hot shutdown condition within four hours and the cold shutdown condition within the following 24 hours. However if the requirements of 3.3.A.4 are exceeded, that is, a second inoperable safety injection pump, then the out-of-service time is assumed to be zero and the plant is immediately brought to the cold shutdown condition in accordance with the applicable prompt shutdown requirements, per Technical Specification Section 3.

Reference 3 stated that the LCOs for inoperable emergency power sources are presently satisfied by Technical Specification 3.7.B.1. Reference 1 states that while this specification satisfactorily addresses the measures to be taken in the event that a diesel generator is inoperable to ensure operability of redundant emergency power supplies, it does not address the main thrust of Model Technical Specification 3.0.5. This model specification allows plant operation to be governed by the time limits of the ACTION statement associated with the LCO for the normal or emergency power source, not the individual ACTION statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source. While this provision is not explicitly stated in the Indian Point 3 Technical Specifications, plant procedure SOP-RPC-8 Rev. 1, "Removal of Safety Related Equipment from Service" is utilized when removing a diesel generator from service. A tabular checklist delineates the time limit for equipment which must be operable in order to conform with the Technical Specifications. In light of Reference 1, proposed changes to the Indian Point 3 Technical Specifications reflecting Model Technical Specification 3.0.5 are provided by Attachment I to this letter.

As per 10 CFR 170.12, enclosed is a check in the amount of \$150.00 in payment of the application fee for the review of these proposed changes to the Technical Specifications.

In accordance with the requirements of 10 CFR 50.91, a copy of this application for amendment to the Operating License and the associated attachment is being submitted to the designated New York State Official.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,



C.A. McNeill, Jr.
Senior Vice President
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