



December 27, 1984
IPN-84-64

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
Environmental Qualification Program - Request
For Scheduling Exemption

Dear Sir:

This letter serves to request an exemption from the schedular requirements of 10 CFR 50.49 for several pieces of equipment.

By letter dated December 27, 1984 (IPN-84-63), the Authority provided a Master List of electrical equipment to be included in the Authority's Equipment Qualification (EQ) Program in accordance with provisions of 10 CFR 50.49. As per 10 CFR 50.49(g), the EQ Program is required to be completed by the end of the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier. As the second refueling outage after March 31, 1982 for Indian Point 3 is anticipated to commence by June 1985, the March 31, 1985 deadline applies.

On March 25, 1982, Indian Point 3 was shutdown for a refueling outage. Coincident with the refueling outage work effort, extensive repairs were made to the steam generator tubes and steam generator girth welds. During this outage, modifications resulting in the qualification of a number of pieces of equipment were completed. The balance of the remaining EQ modifications were scheduled for the next refueling outage which was expected to start by the end of 1984, thereby ensuring timely compliance with 10 CFR 50.49.

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Indian Point 3 power generation resumed on June 8, 1983. On June 18, 1983, the main electrical generator experienced a massive failure resulting in a seven month unscheduled outage. While the Authority's resources, were mainly focused on repairing the electrical generator, additional plant modifications associated with the EQ Program were completed. As a result of this unscheduled outage, the Cycle 4/5 refueling outage will commence after March 31, 1985.

Once it was determined that the Cycle 4/5 refueling outage would commence after March 31, 1985, the Authority maximized its effort to complete as many of the remaining component replacement modifications required by the EQ program as possible, during the October 1984 Steam Generator Inspection outage (Mid-Cycle outage). During this 6 week Mid-Cycle outage, the Authority replaced 34 transmitters inside of containment, 22 solenoids inside and outside of containment and all limit switches scheduled for replacement. However, procurement lead time, equipment design complications, and the short outage duration precluded the Authority from completing all the required modifications. The modifications that remain to be completed to meet the requirements of the EQ program are: replacement of main steam isolation valve solenoid valves; replacement of the three pressurizer level transmitters; replacement of the wide range reactor coolant RTD's; replacement of actuators on motor operated valves 744, 769, and 797; replacement of one train of main steam flow transmitters and replacement of Foxboro transmitter amplifier assemblies.

As the next scheduled outage is the Cycle 4/5 refueling outage, which is planned for late Spring 1985, the Authority will not be able to comply with the requirements of 10 CFR 50.49 by March 31, 1985, for the aforementioned pieces of equipment. As such, the Authority is requesting an extension from March 31, 1985 until the plant is in the cold shutdown condition in anticipation of the Cycle 4/5 refueling outage. During this refueling outage, full compliance with the requirements of 10 CFR 50.49 will be achieved. Attachment 1 to this letter provides a detailed justification for the extension for each specific piece of equipment.

Pursuant to 10 CFR 170.21, enclosed is a check in the amount of \$150.00 in payment of the application fee for the review of this schedular exemption request.

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

Very truly yours,

A handwritten signature in black ink, appearing to read 'Corbin A. McNeill', with a long horizontal flourish extending to the right.

Corbin A. McNeill
Senior Vice President
Nuclear Generation

cc: Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
Buchanan, New York 10511

Attachment 1 to IPN-84-64
Justifications of Request for Extension
Pursuant 10 CFR 50.49 (g)

New York Power Authority
Indian Point 3 Nuclear Power Plant
Docket No. 50-286

- A) TER Item No. 11 - Pressurizer Level Transmitters
LT-459, -460, -461

The Authority procured qualified transmitters from Foxboro and a modification procedure was prepared for the installation of these transmitters during the Steam Generator Inspection Outage. The transmitters that were supplied by Foxboro were not designed for use with a sealed reference leg. The Authority endeavored to modify these transmitters for use with a sealed reference leg, but this would have invalidated their environmental qualification. The Authority ordered new Foxboro transmitters that are designed for use with a sealed reference leg. These transmitters are scheduled to be supplied by Foxboro by January 1985 and will be installed during the Cycle 4/5 refueling outage.

- B) TER Item No. 18 - Solenoids for Main Steam Isolation Valves
MS-1-31, 32, 33 & 34

Environmentally qualified direct replacement solenoid valves for these valves are not available. The Authority at this point undertook a redesign effort in order to utilize qualified ASCO solenoid valves. The redesign effort dealt with the valve resetting and logic methodology. The qualified ASCO solenoid valves will be installed during the Cycle 4/5 refueling outage.

- C) TER Item No. 22 - Reactor Coolant System Wide Range RTD's.

The Authority ordered qualified replacement Resistance Temperature Detectors (RTD) from Westinghouse Electric Corporation. The RTD's supplied by Westinghouse did not include seal assemblies which are required for a qualified installation. The Authority initiated another order with Westinghouse to provide these seal assemblies on the RTD's. The sealed RTD's are expected to be supplied by Westinghouse by May 1985 and will be installed during the Cycle 4/5 refueling outage.

- D) TER Item Nos.62,65 Motorized Valve Actuator for Reactor Coolant Pump Cooling Water Supply Valves
MOV-769,-797
Motorized Valve Actuator for RHR - Isolation Valve
MOV-744

These motorized valve actuators are installed outside containment. Their qualification was established by test reports WCAP-7410L, Limitorque reports 600198 plus addendum 1, 600376A, B0003 and FC-3271. The Authority became aware that the motor brakes with which these actuators are furnished are subject to damage from radiation. Although these valves are outside containment, they could be exposed to radiation during the postulated accident. The radiation levels would be substantially lower than those that caused the failure of the motor brakes. However, the Authority could not establish documentation of the radiation damage threshold. For this reason it was decided to replace the motor brakes with qualified SB conversion kits. Based on advice from Limitorque and further investigation it was determined that this replacement is infeasible in the field. As a result the Authority decided to replace these actuators with new units. These units have been ordered and are expected to be delivered to the site by March 15, 1985. Installation of this modification will take place during the Cycle 4/5 refueling outage.

- E) TER Item No.None-Main Steam Flow Transmitters
FT-419B, -429B, -439B, -449B

Train A of the main steam flow transmitters (FT-419A,-429A,-439A, -449A) have been qualified by sealing the units with RTV-21. This however, would require re-sealing when the seals are broken. In order to avoid this difficulty, the Authority has procured qualified main steam flow transmitters. Transmitters of both trains A and B will be replaced during the Cycle 4/5 refueling outage.

F) TER Item Nos. 2, 3,4,5,11,39

Foxboro Transmitters
General

The Authority had procured transmitters that are qualified in accordance with 10 CFR 50.49. These transmitters were installed during the mid-cycle outage. During this installation the Authority found that the supplied transmitters were not qualified to the requirements of 10 CFR 50.49. The Authority notified the Foxboro Company of this deficiency. It is expected that qualified Foxboro replacement amplifier assemblies will be supplied by May 1985 and will be installed during the Cycle 4/5 refueling Outage.