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November 10, 1987
IPN-87-052

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Withdrawal of Proposed Changes to
Technical Specifications

- References:
1. Letter from Mr. J. P. Bayne to Mr. S. A. Varga, dated December 29, 1983 (IPN-83-102), entitled: "Proposed Changes to the Technical Specifications."
 2. Letter from Mr. J. P. Bayne to Mr. S. A. Varga, dated September 7, 1984 (IPN-84-36), entitled: "Proposed Changes to the Technical Specifications."

Dear Sir:

The Authority requests that the Applications for Amendment to the Operating License transmitted by References 1 and 2 be withdrawn. The basis for the withdrawal of these applications is that Commission Decision CLI-85-06, dated May 7, 1985, did not support the NRC rationale for requiring the proposed changes.

References 1 and 2 were submitted in response to a NRC letter, dated July 7, 1980, which requested the Authority to revise the Indian Point 3 Technical Specifications to achieve consistency with the Standard Technical Specifications, where appropriate. This request was made pursuant to Item F.1.(f)(3) of the Zion/Indian Point Task Action Plan. This Task Action Plan was based on the belief that the Indian Point and Zion sites represent a disproportionately high contribution to the total societal risk from reactor accidents based on their proximity to areas of unusually high population density. The requirements contained in the Task Action Plan were based solely on demographic considerations, and not on plant-specific risk analysis.

After extensive hearings, an Atomic Safety and Licensing Board (ASLB) found that "on the basis of risk involving internally initiated events it does not appear that the Indian

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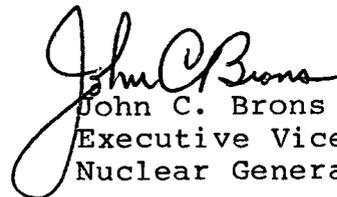
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Point plants present risks worse than those of other plants assessed." This finding was based, in part, on the Indian Point Probabilistic Safety Study, which concluded that the level of risk associated with the Indian Point plants is significantly less than the level of risk reported in WASH-1400 for a typical PWR located at an average or composite site. Based on the ASLB findings, the Commissioners stated in Commission Decision CLI-85-06, dated May 7, 1985, that the record does not show that the Indian Point units are a risk outlier.

Since after extensive hearings the Indian Point units were found not to pose a disproportionately high contribution to the total risk from reactor accidents, the underlying premise of the Task Action Plan has been rejected by the Commission. Since the Applications for Amendment to the Operating License transmitted by References 1 and 2 were submitted solely to achieve consistency with the Standard Technical Specifications per the Task Action Plan and that the applications have not been approved by the NRC staff, the Authority requests that these applications be withdrawn.

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

Very truly yours,



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