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Executive Vice President
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IPN-88-051

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

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

Reference: Generic Letter No. 87-09 dated June 4, 1987, "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions of Operation and Surveillance Requirements."

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications seeks to revise Section 4.1 of Appendix A of the Operating License. The proposed change will modify the applicability of action requirements of Limiting Conditions for Operation (LCOs) associated with missed Surveillance Requirements. Time limits for LCO action requirements will be applied at the time a missed surveillance is identified. A delay of 24 hours will be allowed to perform the missed surveillance before initiating LCO actions for LCO time limits less than 24 hours.

The proposed change to the Technical Specifications is intended to correct difficulties in applying LCOs identified as Problem #2 of the reference generic letter (GL 87-09). Problems #1 and #3 of GL 87-09 are not being considered by this proposed change. The concerns identified by these problems do not affect operation at Indian Point 3 (IP-3) due to the plant specific nature and format of the IP-3 Technical Specifications. A review of Problem #1 identified few LCOs whose action requirements permit operation in a specific operational mode (i.e. termed "reactor operating condition" at IP-3) for an unlimited period of time with inoperable equipment. Specifications governing this type of situation do not restrict entry into a higher reactor operating condition. Concerning Problem #3, no surveillance requirements were identified in IP-3 Technical Specifications that would restrict entry into a lower plant operating condition without first completing surveillance tests.

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The proposed changes are contained in Attachment I to the Application for Amendment enclosed with this letter, while the associated Safety Evaluation is provided in Attachment II.

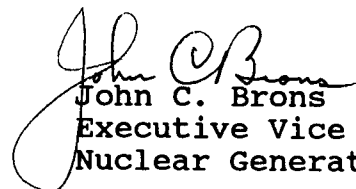
Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License," together with one copy of Attachments I and II thereto, comprising a statement of the proposed changes to the Technical Specifications and the associated Safety Evaluation.

In accordance with 10 CFR 170.12, a check for \$150.00 is enclosed as payment of the application fee for the review of these proposed changes to the Technical Specifications.

In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are 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,


John C. Brons
Executive Vice President
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