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U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attn: Document Control Desk

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Turbine Valve Test Frequency Technical Specification Submittal

- References:
1. Letter from Mr. J. C. Brons (NYPA) to the NRC, "Proposed Changes to Technical Specifications Regarding Turbine Valve Test Frequency and Independent Overspeed Protection System LCOs and Surveillance Requirements," dated March 10, 1989.
 2. Letter from Mr. J. D. Neighbors (NRC) to Mr. J. C. Brons, regarding Turbine Disc Inspection Interval, dated February 26, 1987.
 3. Topical Report WCAP-11525, "Probabilistic Evaluation of Reduction in Turbine Valve Test Frequency."

Dear Sir:

Attachment I to this letter provides replacement pages for Indian Point 3 (IP3) Technical Specifications (Tech. Specs.) transmitted to the NRC with Reference 1. All Tables of the IP3 Tech. Specs. have been reformatted and retyped so that they are more readable. Tables 3.5-2, 4.1-1, and 4.1-3 are being provided in their entirety because of the reformatting. No other changes have been made to these tables except for the correction of an administrative oversight. Column 5 of Table 3.5-2, Sheet 2, for the "Turbine Trip: Electrical overspeed protection" entry was not deleted as required. The new page includes deletion of that entry. Also enclosed is an updated page 4.1-3. This page of the bases has been changed to delete the numerical value of the NRC acceptance criteria for the probability of a missile ejection incident. The acceptance criteria are more detailed than a single numerical value would indicate. The acceptance criteria are discussed further in the following paragraph.

The following information is provided to clarify Reference 1 regarding the acceptance criteria mentioned above. Table 1 of the Safety Evaluation Report of Reference 2 contains progressive acceptance criteria for missile ejection probability. Indian Point 3 has an unfavorably oriented turbine, and rotor inspections are based on the probabilistic method. A

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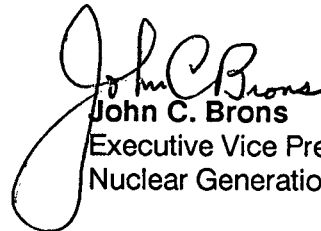
missile ejection probability of less than 1×10^{-5} (Criterion A) is the maximum allowed probability prior to loading the turbine and bringing the system on line. Criterion B allows a probability of greater than 1×10^{-5} , but less than 1×10^{-4} , to be reached during operation, until the next scheduled outage. Figure 8.3-5 (included as part of Enclosure 3 to Reference 1) shows the following IP3 total annual probability of missile ejection, with a Turbine Valve Test frequency of twelve months:

- For the first quarter of the last year of operation (Case 1), the probability is less than 1×10^{-5} .
- For the end of the last year of operation (Case 2), the probability is less than 1×10^{-4} .

Therefore, the interval between turbine valve tests can be increased from monthly to yearly for IP3; the probability of a turbine missile accident remains well within the NRC accepted limits for this accident.

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
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