



John C. Brons
Executive Vice President
Nuclear Generation

February 12, 1990
IPN-90-007

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
Related to Allowable Extensions for Surveillance Intervals

References: Generic Letter 89-14 dated August 21, 1989, "Line-Item
Improvements in Technical Specifications - Removal of the
3.25 Limit on Extending Surveillance Intervals."

Dear Sir:

This application for amendment to the Indian Point 3 (IP3) Technical Specifications seeks to revise Definition 1.12 of Appendix A of the Operating License. Using the guidance provided in the referenced letter, this submittal proposes a change to the allowable extensions to surveillance intervals. The proposed change removes the statement which limits the allowable extension for three (3) consecutive surveillance intervals to 3.25 times the specified surveillance interval. This change removes unnecessary restrictions on extending surveillance requirements and can result in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The bases in section 4.1 of the Technical Specifications have been revised to include the basis of Definition 1.12. This submittal also proposes to remove the statement which excludes shift and daily surveillances from the 25-percent allowance to extend surveillance intervals.

Peter Kokolakis, Director of PWR-Licensing for the New York Power Authority, spoke with Thomas G. Dunning of the NRC and Joseph D. Neighbors, NRC Senior Project Manager for IP3, to discuss the Authority's understanding of the use of the 25-percent allowance for the extension of surveillance intervals which are not performed on a refueling outage basis. As a result of this discussion the Authority will continue to use the 25-percent allowance of Definition 1.12 to allow the schedule flexibility necessary for the performance of these surveillances. The Authority

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understands that this 25-percent allowance is not to be used for convenience so that the intent of non-refueling surveillances (weekly, monthly, quarterly, etc.) is essentially defeated. Therefore, the Authority may administratively impose the 3.25 limitation on non-refueling surveillances to avoid inadvertent misuse of the 25-percent allowance.

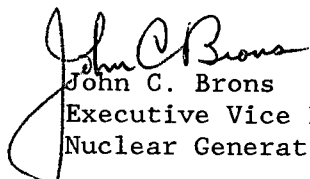
The proposed changes are contained in Attachment I to the Application for Amendment enclosed with this letter, while the associated Safety Evaluation is provided in Attachment II.

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 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
Nuclear Generation

cc: U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, N.Y. 10511

Ms. Donna Ross
New York State Energy Office
Empire State Plaza
Building Number 2 - 16th Floor
Albany, N.Y. 12223

Joseph D. Neighbors, Sr. Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, D.C. 20555