

ATTACHMENT I TO IPN-90-015

PROPOSED TECHNICAL SPECIFICATION CHANGES
REGARDING SURVEILLANCE REQUIREMENTS FOR CONTROL ROD
PARTIAL MOVEMENT TESTING

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

9004040018 900323
PDR ADOCK 05000286
P PDC

TABLE 4.1-3 (Sheet 1 of 2)

FREQUENCIES FOR EQUIPMENT TESTS			
		<u>Check</u>	<u>Frequency</u>
1.	Control Rods	Rod drop times of all control rods	R
2.	Control Rods	Movement of at Least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations
3.	Pressurizer Safety Valves	Set Point	R
4.	Main Steam Safety Valves	Set Point	R
5.	Containment Isolation System	Automatic actuation	R
6.	Refueling System Interlocks	Functioning	R (Prior to movement of core components)
7.	Primary System Leakage	Evaluate	5 days/week
8.	Diesel Generators Nos. 31, 32, & 33 Fuel Supply	Fuel Inventory	Weekly
9.	Turbine Steam Stop Control Valves	Closure	Monthly
10.	L.P. Steam Dump System (6 lines)	Closure	Monthly
11.	Service Water System	Each pump starts and operates for 15 minutes (unless already operating)	Monthly
12.	City Water Connections to Charging Pumps and Boric Acid Piping	Temporary connections available and valves operable	R

Table 4.1-3 (Sheet 2 of 2)

13.	RHR Valves 730 and 731	Automatic isolation and interlock action	R*
14.	PORV Block Valves	Operability through 1 complete cycle of full travel	R
15.	PORV Valves	Operability	R
16.	Reactor Vessel Head Vents	Operability	R

R Each Refueling Outage

* If not done during the previous 18 months, the check will be performed next time the plant is cooled down.

ATTACHMENT II TO IPN-90-0158

SAFETY EVALUATION
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
SURVEILLANCE REQUIREMENTS FOR CONTROL ROD PARTIAL
MOVEMENT TESTING

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

**SAFETY EVALUATION OF
PROPOSED TECHNICAL SPECIFICATIONS REGARDING
SURVEILLANCE REQUIREMENTS FOR CONTROL ROD
PARTIAL MOVEMENT TESTING**

Section I - Description of Changes

The proposed changes would modify Table 4.1-3, "Frequencies for Equipment Tests," which provides surveillance testing requirements for selected plant equipment. The proposed changes revise the requirements for partial movement testing of all control rods to conform with those of Westinghouse Standard Technical Specifications.

Section II - Evaluation of Changes

The present Technical Specifications require surveillance testing of all control rods for partial movement, but do not specify the amount of movement. One of the proposed changes would specify control rod movement of at least 10 steps in any one direction, thus clarifying the minimum number of steps required to assure control rod freedom of movement. This change will enhance the clarity of the Technical Specifications, and ensure that the rods are moved an adequate amount without causing undue core perturbation.

The proposed change from a two week surveillance interval to a 31 day surveillance interval would reduce the mechanical wear on the drive mechanisms and reduce the wear on rod control cluster cladding caused by more frequent rod insertions. Additionally, less frequent testing would cause less perturbation of the core. Moreover, the proposed change would not have a significant impact on plant safety. Historically, Indian Point Unit No. 3 (IP3) has never detected mechanical binding of a control rod during movement exercise, and never has a control rod failed to go to the fully inserted position when required. Also, a change from a two week to a monthly test interval has no impact on the Rod Cluster Control System failure modes.

Section III - No Significant Hazards Evaluation

Consistent with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response:

The proposed change to specify control rod movement of at least 10 steps clarifies the Technical Specifications, ensuring freedom of movement without causing undue core perturbation. The proposed change from a two week to a monthly test interval reduces wear on the drive mechanisms and the rod control cluster cladding. Indian Point 3 has never detected mechanical binding of a control rod during movement exercise, and never has a control rod failed to go to the fully inserted position when required. The proposed changes do not adversely affect control rod safety functions, and do not involve a significant increase in the probability or consequences of a previously analyzed accident.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed changes involve specifying the number of steps required to ensure control rod freedom of movement and the frequency at which movement tests would be performed. These changes do not result in a change in rod cluster control system failure modes. Thus, the proposed changes do not adversely affect control rod safety functions, and do not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed change specifying the minimum number of steps required to ensure control rod freedom of movement provides an additional limitation not currently contained in the technical specifications. This change ensures adequate movement without undue core perturbation, and does not involve a reduction in a margin of safety. The proposed change from a two week to a monthly test interval is expected to have an insignificant effect on safety. Control rod safety functions and mechanisms are not affected. The proposed changes are in accordance with Westinghouse Standard Technical Specifications and

have been approved for other plants. The proposed changes do not involve a significant reduction in a margin of safety.

Section IV - Impact of Change

These changes will not adversely impact the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR or SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any Technical Specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

- a) IP3 FSAR
- b) IP3 SER
- c) NUREG-0452, Westinghouse Standard Technical Specifications (W-STC)