



**John C. Brons**  
Executive Vice President  
Nuclear Generation

July 10, 1990  
IPN-90-038

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**  
**Proposed Changes to Technical Specifications**  
**Regarding Diesel Generator Allowed Outage Time**

- References:
1. NRC letter, S. A. Varga to G. T. Berry, dated January 15, 1981 ( Issuing Amendment No. 34 to the Indian Point 3 Facility Operating License ).
  2. NRC letter, S. A. Varga to G. T. Berry, dated July 7, 1980 ( Requesting upgrading of the Indian Point 3 Technical Specifications ).
  3. NYPA letter, W. A. Josiger to W. T. Russell, "Indian Point 3 Nuclear Power Plant Request for Discretionary Enforcement," dated August 19, 1988.
  4. NRC letter, J. M. Allan to W. A. Josiger, "Discretionary Enforcement Relating to the No. 32 Emergency Diesel Generator," dated August 24, 1988.
  5. NYPA letter, J. P. Bayne to S. A. Varga, "Proposed Changes of the Technical Specifications," dated September 29, 1980.

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications seeks to increase the allowed outage time (AOT) for the emergency diesel generators (EDG's) from 72 hours to seven days. A seven day AOT was provided by Technical Specification 3.7.B.1 beginning with original plant licensing until January 15, 1981. Reference 1 revised specification 3.7.B.1 (from seven days to three days) to be consistent with the Standard Technical Specifications, in accordance with item F.1.f.3 of the Zion/Indian Point Task Action Plan.

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Reference 4, the Commission granted the Authority's request. EDG 32 was repaired and returned to service within the extension period.

This example highlights the difficulties that short allowed outage times can impose on plant operation. The Authority believes that the exercise of discretionary enforcement action by the NRC is necessary from time to time. However, where the exercise of discretion can be avoided by resolving the underlying problem, such action must be pursued.

Indian Point 3 (IP3) was licensed in early 1976 with a seven day AOT for the diesels. As a result of the Zion/Indian Point Task Action Plan, the staff requested (in Reference 2) that various IP3 Technical Specifications (Tech. Specs.) be "upgraded" to be at least as "stringent" as the Standard Technical Specifications; one of these was the EDG AOT. This request was not accompanied by a detailed rationale, but was based on Standard Tech. Specs. However, Standard Tech. Specs. assume a standard configuration of only two EDG's; IP3 has three EDG's. Therefore, the Authority believes that a 72 hour EDG AOT is inappropriate for IP3. Nevertheless, the Authority responded to the staff request by submitting a proposed Tech. Spec. change (Reference 5).

The Zion/Indian Point Task Action Plan was based on the belief that the Indian Point and Zion sites represented 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 a plant specific risk analysis.

After extensive hearings before an Atomic Safety and Licensing Board, 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 risk outliers. This finding was based, in part, on the Indian Point Probabilistic Safety Study (IPPSS), 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 pressurized water reactor located at an average or composite site.

With respect to the EDG's, the IPPSS modeled the IP3 electric power system based on the Tech. Specs. that were in effect at the time. The EDG outage time used was the seven days provided by Specification 3.7.B.1. On that basis, the Authority believes that the Commission decision concluding that the record does not show the Indian Point units to be risk outliers is justification alone for reinstating the seven day AOT. Nevertheless, the Authority has assessed the impact of changing the EDG AOT from 72 hours to seven days on the overall unavailability of electric power to the safety related buses. This probabilistic assessment, entitled "Diesel Generator Technical Specification Study For Indian Point 3," is provided as Appendix A to this application. The results of this study show that there is no significant increase in electric power unavailability because of this minor change in allowed outage time. The assessment contained in Appendix A is based on the present plant electric power system design updated to reflect hardware modifications implemented since the IPPSS was developed. In addition, enhancements in probabilistic risk assessment methods developed since the IPPSS, such as the treatment of common mode failure, have been employed.

The Authority believes the Tech. Spec. change proposed will enhance the overall safety of Indian Point 3 by allowing an adequate time period for most diesel repairs, increasing the thoroughness and quality of the repairs. Increasing the allowed outage time will help to avoid

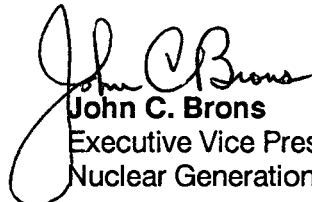
unnecessary plant shutdowns. Performing unnecessary shutdowns incurs the risk of additional challenges to safety systems associated with changes in plant operating conditions.

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: See next page

cc: U.S. Nuclear Regulatory Commission  
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BEFORE THE UNITED STATES  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
POWER AUTHORITY OF THE STATE OF NEW YORK  
Indian Point 3 Nuclear Power Plant

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) Docket No. 50-286  
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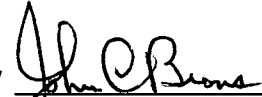
APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, the Power Authority of the State of New York, as holder of Facility Operating License No. DPR-64, hereby applies for an Amendment to the Technical Specifications contained in Appendix A of this license.

This application seeks to amend the Indian Point 3 Technical Specifications, page 3.7-2, to extend the allowed outage time for the Emergency Diesel Generators from 72 hours to seven days.

The proposed changes to the Technical Specifications are presented in Attachment I to this application. The Safety Evaluation is contained in Attachment II.

POWER AUTHORITY OF THE  
STATE OF NEW YORK

By   
**John C. Brons**  
Executive Vice President  
Nuclear Generation

STATE OF NEW YORK  
COUNTY OF WESTCHESTER

Subscribed and Sworn to before me  
this 10<sup>th</sup> day of July 1990

  
Notary Public

**BARBARA ANN TAGGART**  
NOTARY PUBLIC, State of New York  
No. 4851437  
Qualified in Putnam County  
Commission Expires Jan. 27, 1992