ATTACHMENT I TO IPN-90-038

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

EMERGENCY DIESEL GENERATORS ALLOWED OUTAGE TIME

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

and is in addition to the fuel requirements for other nuclear units on the site.

6. Three batteries plus three chargers and the D.C. distribution systems operable.

7. No more than one 120 volt A.c. Instrument Bus on the backup power supply.

B. The requirements of 3.7.A may be modified to allow any one of the following power supplies to be inoperable at any one time.

1. One diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 7 days provided the 138 KV and the 13.8 KV sources of offsite power are available and the remaining diesel generators are tested daily to ensure operability and the engineered safety features associated with these diesel generator buses are operable.

2. The 138 KV or the 13.8 KV sources of power may be inoperable for 48 hours provided the three diesel generators are operable. This operation may be extended beyond 48 hours provided the failure is reported to the NRC within the 48 hours period with an outline of the plans for restoration of offsite power and NRC approval is granted.

ATTACHMENT II TO IPN-90-038

SAFETY EVALUATION

RELATED TO

EMERGENCY DIESEL GENERATORS ALLOWED OUTAGE TIME

TECHNICAL SPECIFICATION CHANGES

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

Section I - Description of Change

This proposed change to the Indian Point 3 (IP3) Technical Specifications seeks to increase the allowed outage time (AOT) for the Emergency Diesel Generators (EDGs). Technical Specification (Tech. Spec.) section 3.7.B.1. (page 3.7-2) would be changed to allow an EDG outage time of seven days, instead of the currently allowed 72 hours. A seven day AOT was in effect when IP3 was originally licensed.

Section II - Evaluation of Change

This change would reinstate the seven day AOT which was in effect from the time of original plant licensing until January 15, 1981, when Amendment No. 34 became effective.

As a result of the Zion/Indian Point Task Action Plan, the NRC staff requested that IP3 change the allowed EDG outage time from seven days to 72 hours. 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. Nevertheless, Indian Point 3 was responsive to the staff request, and Amendment No. 34 was issued, effective January 15, 1981.

This proposed change is expected to enhance overall plant safety by improving EDG reliability, through the allowance of an increased time for DG maintenance. An increase in the allowable outage time will add flexibility to the performance of repairs, and increase the thoroughness and quality of EDG maintenance. Additionally, a longer AOT will minimize unnecessary shutdowns that are required because of EDG inoperability. Performing unnecessary shutdowns incurs the risk of additional challenges to safety systems associated with changes in plant operating conditions.

Appendix A contains the study titled "Diesel Generator Technical Specification Study For Indian Point 3." This study evaluates the impact of increasing the DG AOT on the following measures of risk:

- power unavailability to the 480V buses (given that a loss of offsite power has occurred)
- core damage frequency

The study concludes that, for both of these measures of risk, the change in AOT has an insignificant impact relative to the underlying uncertainties involved. The quantitative results do not take credit for power recovery using the Appendix R diesel. Modeling of the Appendix R diesel would reduce the impact of the EDG AOT change on these measures of risk.

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:

Operation of Indian Point 3 in accordance with the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Implementation of the proposed change is expected to result in an increase in the probability of core damage, from 1.54×10^{-4}/year to 1.56×10^{-4}/year. This increase is considered to be insignificant relative to the underlying uncertainties involved. This proposed change would return the EDG AOT technical specification to 7 days. Seven days is the original technical specification and licensing basis value of the EDG AOT.

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

Response:

Operation of Indian Point 3 in accordance with the proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

No change is being made in the manner in which the EDG's provide plant protection. No new modes of plant operation are involved. Extending the EDG AOT does not necessitate physical alteration of the plant or changes in plant operational limits. This proposed change would return the EDG AOT technical specification to 7 days. Seven days is the original technical specification and licensing basis value of the EDG AOT.

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

Response:

Operation of Indian Point 3 in accordance with the proposed license amendment does not involve a significant reduction in a margin of safety.

As detailed in the study contained in Appendix A, extending the EDG allowed outage time involves an incremental reduction in the margin of safety. The magnitude of this reduction is insignificant compared to the uncertainties involved.

The capability to power vital and auxiliary system components remains available via the other two EDGs. This proposed change would return the EDG AOT technical specification to 7 days. Seven days is the original technical specification and licensing basis value of the EDG AOT.

As previously stated, implementation of the proposed change is expected to result in an insignificant increase in: (1) power unavailability to the 480V buses (given that a loss of offsite power has occurred), and (2) core damage frequency. EDG reliability improvement is expected due to increased quality and thoroughness of DG maintenance. Implementation of the proposed change does not increase the consequences of a previously analyzed accident nor significantly reduce a margin of safety. Functioning of the EDG's and the manner in which limiting criteria are established are unaffected.

Section IV -Impact of Change

This change 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 this change: (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) PLG-0690, Revision 2, "Diesel Generator Technical Specification Study For Indian Point 3," April, 1990.

APPENDIX A TO IPN-90-038

DIESEL GENERATOR TECHNICAL SPECIFICATION STUDY FOR INDIAN POINT 3

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