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Executive Vice President
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July 10, 1990
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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
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.

In Reference 3, as a result of a failure associated with EDG 32, the Authority requested the exercise of discretionary enforcement to permit plant operation for an additional 96 hours while repairs were completed. The Authority's basis for requesting that extension was the excellent past reliability of the EDG's, the availability of several alternate and diverse power sources, and the projection that EDG 32 could and would be repaired within the requested extension period. In

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