



August 31, 1990
IPN-90-046

John C. Brons
Executive Vice President
Nuclear Generation

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 Pressure-Temperature (P-T) Limits

- References:**
1. Generic Letter 88-11, "NRC Position On Radiation Embrittlement Of Reactor Vessel Materials And Its Impact On Plant Operations," dated July 12, 1988.
 2. WCAP-11815, "Analysis Of Capsule Z From The New York Power Authority Indian Point Unit 3 Reactor Vessel Radiation Surveillance Program," dated March 1988.
 3. "Final Report On Pressure-Temperature Limits For Indian Point Unit 3 Nuclear Power Plant," dated July 1990.

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications seeks to amend Section 3.1.B (Heatup and Cooldown), Section 4.3 (Reactor Coolant System Integrity Testing), and Section 3.1.C (Minimum Conditions for Criticality). Sections 3.1.B and 4.3 are being amended to incorporate revised pressure-temperature limits. These revisions are being made in accordance with Reference 1, which requested that licensees use the methodology of Regulatory Guide (RG) 1.99 Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," to predict the effect of neutron radiation on reactor vessel materials. Section 3.1.C is being amended to delete Section 3.1.C.2 which establishes pressure-temperature requirements on the reactor coolant system when the reactor is critical.

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. Attachment III "Final Report On Pressure-Temperature Limits For Indian Point Unit 3 Nuclear Power Plant" describes the methodology used in developing the pressure-temperature curves.

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License," together with one copy of Attachments I, II and III thereto, comprising a

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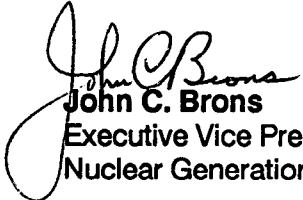
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statement of the proposed changes to the Technical Specifications, the associated Safety Evaluation and the associated analysis report.

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.

If you have any questions about this subject, please contact Mr. P. Kokolakis of my staff.

Very truly yours,


John C. Brons
Executive Vice President
Nuclear Generation

- Attachments:
- I. Proposed Technical Specification changes related to pressure-temperature and low temperature over pressure protection limits.
 - II. Safety Evaluation related to pressure-temperature and low temperature over pressure protection limits.
 - III. Analysis report entitled, "Final Report On Pressure-Temperature Limits For Indian Point Unit 3 Nuclear Power Plant."

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