



**Ralph E. Beedle**  
Executive Vice President  
Nuclear Generation

August 30, 1991  
IPN-91-033

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Attention: Document Control Desk

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Proposed Changes to Technical Specifications to  
Change the Shutdown Margin to a Constant 1.3%  $\Delta k/k$

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications requests a change in the shutdown margin to a constant 1.3%  $\Delta k/k$ . Analyses have been performed to evaluate the affects of the new shutdown margin on plant operation and safety (Attachment III). A change in the shutdown margin is needed to support future reload designs of longer cycle lengths.

Reviews have been performed in areas which include Loss-of-Coolant Accident (LOCA) Analyses, Non-LOCA Transient Analyses, LOCA Forces, Containment Integrity, Instrumentation and Control Systems, Technical Specifications, Plant Fluid Systems, Reactor Coolant System and Components, Steam Generator Tube Rupture Accident Analyses, and Risk Assessment. Specific analyses that were potentially affected due to the change in shutdown margin were LOCA Analyses, Non-LOCA Transient Analyses, Containment Integrity, and Technical Specifications. The evaluations performed considered the current licensing basis analyses which includes the bounding effects of up to 24% uniform and asymmetric steam generator tube plugging.

All licensing basis accidents which consider shutdown margin have been evaluated for a shutdown margin of 1.3%  $\Delta k/k$  and have demonstrated acceptable results. The change in the Indian Point Unit 3 shutdown margin to a constant value of 1.3%  $\Delta k/k$  (when  $(T_{avg} > 200^\circ F)$ ) will not adversely affect safe plant operation, and will not constitute an unreviewed safety question.

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.

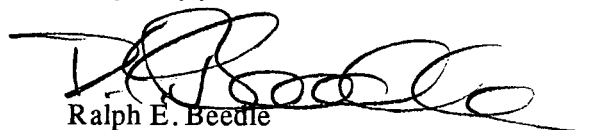
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In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis.

Very truly yours,



Ralph E. Beedle  
Executive Vice President  
Nuclear Generation

- Attachments:
- I. Proposed Technical Specifications changes related to Shutdown Margin.
  - II. Safety Evaluation related to Shutdown Margin.
  - III. Westinghouse Safety Evaluation. SECL-90-298. (Source: Letter INT-91-535 from John F. Hofscher, Westinghouse to G. Canavan, dated May 16, 1991.)

cc: U.S. Nuclear Regulatory Commission  
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