



Ralph E. Beedle
Executive Vice President
Nuclear Generation

October 28, 1991
IPN-91-040

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 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) and
Overpressure Protection System (OPS) Limits

- References:
1. IPN-90-046 "Proposed Changes to Technical Specifications Regarding Pressure-Temperature Limits," dated August 31, 1990.
 2. Generic Letter 88-11, "NRC Position On Radiation Embrittlement Of Reactor Vessel Materials and Its Impact On Plant Operations," dated July 12, 1988.
 3. "Final Report On Pressure-Temperature Limits For Indian Point Unit 3 Nuclear Power Plant" ABB Combustion Engineering, dated July 1990.
 4. WCAP-11815, "Analysis Of Capsule Z From The New York Power Authority Indian Point Unit 3 Reactor Vessel Radiation Surveillance Program," dated March 1988.

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications seeks to revise Section 3.1.A (Operational Components), Section 3.1.B (Heatup and Cooldown), Section 3.3 (Engineered Safety Features) and Section 4.3 (Reactor Coolant System Integrity Testing). These sections are being amended to extend the Heatup-Cooldown limits to 11.0 effective full power years (EFPYs) and to provide for the corresponding Overpressure Protection System (OPS) limits.

Reference 1 transmitted the Authority's request to amend the Heatup-Cooldown limits in accordance with the requirements of Reference 2. Reference 2 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 as required

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by Paragraph V.A. of 10 CFR Part 50 Appendix G. The revisions in this amendment are based on data contained in Reference 3 which was submitted with Reference 1.

In addition to the technical changes the affected sections are being amended to implement pagination and format changes that constitute human factors improvements to these sections and to correct typographical errors.

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.

If you have any questions please contact Mr. P. Kokolakis.

Very truly yours,



Ralph E. Beedle
Executive Vice President
Nuclear Generation

- Attachments:
- I. Proposed Technical Specification changes related to pressure-temperature and overpressure protection system limits.
 - II. Safety Evaluation related to pressure-temperature and overpressure protection system limits.

cc: See next page

cc: U.S. Nuclear Regulatory Commission
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