



July 17, 1992
IPN-92-034

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Executive Vice President
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U.S. Nuclear Regulatory Commission
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**Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Proposed Changes to Technical Specifications Regarding Extending
Containment Systems Testing to Accommodate a 24 Month Operating Cycle**

Reference: 1. NRC Generic Letter 91-04, entitled "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle."

Dear Sir:

This application for amendment to the Indian Point 3 Technical Specifications proposes to change the frequency of containment systems testing to accommodate operation with a 24 month operating cycle. This letter also requests an exemption from the requirements of 10 CFR 50, Appendix J, for type B and type C leak testing.

Starting with cycle nine (scheduled to start in July, 1992), Indian Point 3 will begin 24 month operating cycles, instead of the current 18 month cycles. The specific Technical Specifications that will be changed by this application are:

- the basis that describes applying the 25% extension to surveillance frequencies (section 4.1),
- testing the automatic actuation of the containment isolation system (table 4.1-3),
- sensitive leakage rate and containment isolation valve testing (section 4.4),
- containment spray system testing (section 4.5), and
- spray additive valve testing (section 4.5).

The request for an exemption from 10 CFR 50, Appendix J, is specifically to allow a 25% increase in the 24 month surveillance interval for type B and C leak tests, so that the leak test intervals are compatible with the proposed and anticipated changes in Technical Specification surveillance intervals to accommodate a 24 month operating cycle. Generic Letter 91-04 (Reference 1) recognized the need for an exemption from Appendix J requirements to support a 24 month operating cycle.

The proposed changes are contained in Attachment I to the Application for Amendment enclosed with this letter, and the associated Safety Evaluation is provided as Attachment II.

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A copy of this application and the associated attachments are being provided to the designated New York State official as required by 10 CFR 50.91.

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

Very truly yours,



Ralph E. Beedle
Executive Vice President
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att: As stated

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