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IPN-92-059

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

Dear Sir:

By letter dated July 17, 1992, the Authority proposed changing the frequency of containment systems testing, and also requested an exemption from the 10 CFR 50, Appendix J, requirements for type B and C containment leakage testing. As described in Attachment I to this letter, the Authority is amending the July 17 letter to request an exemption from type C testing requirements only.

By letter dated September 29, 1992, the Authority proposed changing Auxiliary Feedwater System testing to accommodate operation with a 24 month operating cycle. The September 29 letter included a request for an administrative change to Technical Specification (Tech. Spec.) 4.8.3.b., to verify that each Auxiliary Boiler Feedwater Pump will start upon receipt of an (versus the current each) auxiliary feedwater actuation test signal. Attachment II to this letter is an analysis of the change to Tech. Spec. 4.8.3.b., in the format of answers to the questions provided as the "no significant hazards consideration" criteria in 10 CFR 50.92.

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

Very truly yours,


Ralph E. Beedle

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Attachment I to IPN-92-059

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**Supplement to Containment Systems Testing Technical
Specification Changes Proposed by July 17, 1992 Letter**

Background

By letter dated July 17, 1992, the Authority proposed changing the Technical Specification required frequency of containment systems testing, from no greater than 2 years to no greater than 30 months, to accommodate a 24 month operating cycle. Because 10 CFR 50, Appendix J requires that type B and C containment leakage testing be performed at intervals no greater than 2 years, the July 17 letter also requested an exemption from the type B and C frequency requirements of Appendix J. As discussed below, the Authority is amending the July 17 letter to request an exemption from 10 CFR 50, Appendix J, for only type C testing, not for type B and C testing.

The July 17 letter asked for an exemption for both type B and C testing based on past plant leakage testing practices. IP3 Technical Specification 4.4.E.2.a. states that every 2 years the acceptance criteria for leakage of isolation valves, air locks, and portions of the sensitive leakage rate test pertaining to containment penetrations and double gasketed seals is verified to be less than 0.6 L_a (proposed to be changed to 0.5 L_a by the July 17 letter). In order to demonstrate compliance with this specification, IP3 has historically performed type B and C containment leak testing at each refueling outage, to ensure that the current actual leakage rate is as accurate and up-to-date as possible. Because the plant practice is to test both type B and C leakage at the same time, the July 17 letter asked for an exemption from Appendix J for both type B and C leak testing, so that it would be clear that compliance with the acceptance criteria of specification 4.4.E.2.a. would be demonstrated by testing at refueling outages, to a maximum interval of 30 months (24 + 25%).

Discussion

The Code of Federal Regulations, in 10 CFR 50, Appendix J, requires that containment leakage testing (type B and C) be performed at intervals no greater than 2 years. However, section III.D.2. (a) of Appendix J states that, for primary reactor containment penetrations employing a continuous leakage monitoring system, type B tests may be performed at every other refueling but in no case at intervals greater than three years. The Indian Point 3 containment is provided with a Weld Channel and Containment Penetration Pressurization System (WCCPPS) that supplies pressurized air to containment electrical and piping penetrations, airlocks, and the channels over the welds in the containment's inner steel liner. Leakage from these penetrations and welds is determined daily by evaluating the daily WCCPPS air consumption. The existence of the WCCPPS allows containment type B testing to be performed at intervals not to exceed three years, as allowed by Appendix J and IP3 technical specification 4.4.C.3. Because Appendix J allows type B testing at IP3 to be performed at intervals up to three years, an exemption from Appendix J to perform type B testing at a maximum of 30 months (24 + 25%) is not required.

Attachment II IPN-92-059

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Supplement to Auxiliary Feedwater System Testing Technical Specification Changes Proposed by September 29, 1992 Letter

Background

By letter dated September 29, 1992, the Authority proposed changing auxiliary feedwater system testing to accommodate operation with a 24 month operating cycle. The September 29 letter included a request for an administrative change to Technical Specification 4.8.3.b., to verify that each Auxiliary Boiler Feedwater Pump will start upon receipt of an (versus the current each) auxiliary feedwater actuation test signal. The safety evaluation included with the September 29 letter as Attachment II provided a detailed description of the proposed administrative change, but did not specifically address the administrative change in the "no significant hazards evaluation" section. Provided below are (1) a description of the change requested (as provided in Attachment II of the September 29 letter) and (2) an analysis of the proposed change in the format of answers to the "no significant hazards consideration" criteria questions given in 10 CFR 50.92.

Description of Change

Technical Specification 4.8.3.b. currently requires verification, once every refueling outage, that each Auxiliary Boiler Feedwater Pump (ABFP) will start upon receipt of each auxiliary feedwater actuation test signal. The motor-driven ABFPs are actuated by any of the following: (1) loss of voltage on 480 VAC bus 6A (ABFP33) or bus 3A (ABFP31) without safety injection initiation (non-SI blackout), (2) low-low level in any steam generator, (3) trip of either main boiler feed pump, or (4) a safety injection signal. The steam turbine-driven pump is actuated by either a low-low level in two of four steam generators, or by a non-SI blackout signal. Indian Point 3 verifies the simulated automatic actuation of the ABFPs every refueling cycle during the ABFP full flow test. This test automatically starts the motor-driven ABFPs (and demonstrates full flow) by simulating a loss of the Main Boiler Feed Pumps. Operability of the turbine driven pump is validated by opening the steam admission valve, throttling the governor valve, and verifying flow to each of the steam generators. Other automatic start signals (for example, safety injection initiation) for the ABFPs are governed by the Technical Specifications in Table 4.1-1 (instrumentation surveillances) and specification 4.5.A.1.b. (safety injection surveillance). The other auto-start signals will be verified by a combination of channel functional tests, logic tests, and instrument checks/calibrations. This approach is similar to the Westinghouse Standard Technical Specifications where only one test signal is required for the initiation of the simulated automatic actuation test. Because the other automatic start signals are covered by other Technical Specifications, the Authority is proposing to change Specification 4.8.3.b. to require verification of ABFP start upon receipt of an (versus each) actuation signal. This wording ("an" instead of "each") is consistent with the wording of Westinghouse Standard Technical Specifications.

No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the change from "each" to "an" in Technical Specification 4.8.3.b. is judged to involve no significant hazards based on the following information:

- (1) Does the proposed license amendment involve a significant increase in the probability or consequences of any accident previously evaluated?

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Response:

The proposed change does not involve a significant increase in the probability or consequences of any accident previously analyzed. The change to Technical Specification 4.8.3.b. (from "each" actuation signal to "an" actuation signal) is an administrative change that, when considered in combination with other existing technical specification requirements, does not reduce the overall testing of the auxiliary feedwater pump actuation test signals. The ABFP full flow test verifies the start of the ABFPs by simulating a loss of the Main Boiler Feed Pumps. Other start signals are governed by tech. spec. Table 4.1-1 and specification 4.5.A.1.b. The proposed wording is similar to the approach taken by the Westinghouse Standard Technical Specifications.

- (2) Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response:

The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated. The change to Technical Specification 4.8.3.b. (from "each" actuation signal to "an" actuation signal) is an administrative change that, when considered in combination with other existing technical specification requirements, does not reduce the overall testing of the auxiliary feedwater pump actuation test signals. The ABFP full flow test verifies the start of the ABFPs by simulating a loss of the Main Boiler Feed Pumps. Other start signals are governed by tech. spec. Table 4.1-1 and specification 4.5.A.1.b. The proposed wording is similar to the approach taken by the Westinghouse Standard Technical Specifications.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The proposed changes do not involve a significant reduction in a margin of safety. The change to Technical Specification 4.8.3.b. (from "each" actuation signal to "an" actuation signal) is an administrative change that, when considered in combination with other existing technical specification requirements, does not reduce the overall testing of the auxiliary feedwater pump actuation test signals, nor does it change any system setpoints. The ABFP full flow test verifies the start of the ABFPs by simulating a loss of the Main Boiler Feed Pumps. Other start signals are governed by tech. spec. Table 4.1-1 and specification 4.5.A.1.b. The proposed wording is similar to the approach taken by the Westinghouse Standard Technical Specifications.