

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



John H. Garrity
Resident Manager

June 1, 1993
IPN-93-047

Docket No. 50-286
License No. DPR-64

Mr. Thomas T. Martin
Regional Administrator
Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: Indian Point 3 Nuclear Power Plant
Request for Enforcement Discretion for
Technical Specification Requirements
Pertaining to Emergency Diesel Generators

Reference: NRC Memorandum from T.E. Murley, Director,
Office of Nuclear Reactor Regulation,
"Temporary Waivers of Compliance", dated
February 22, 1990.

Dear Mr. Martin:

The purpose of this letter is to request enforcement discretion for Technical Specification Section 3.7.F.4 which, in part, requires two operable diesel generators under all plant conditions including cold shutdown. The justification for this request is provided in Attachment 1 and follows the guidance provided in the referenced memorandum.

If granted, this enforcement discretion will allow two emergency diesel generators to be inoperable for two consecutive time periods of up to 24 hours and 72 hours respectively.

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Should you or your staff have any questions please contact
Mr. James Comiotes at (914) 736-8029.

Very truly yours,



John H. Garrity
Resident Manager
Indian Point Three Nuclear Power Plant

JHG/fp
Attachments

cc: Document Control Desk (Original)
Mail Station PI-137
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

1. Requirement Needing Enforcement Discretion

Indian Point Unit 3 Technical Specification 3.7.F.4 requires:

Two operable diesel generators together with total underground storage containing a minimum of 5676 gallons of fuel under all plant conditions including cold shutdown.

The Authority is requesting enforcement discretion which would allow two Emergency Diesel Generators (EDGs) to be inoperable for two consecutive time periods not to exceed 24 hours and 72 hours respectively. The request would allow the Authority to proceed with the preventive maintenance (PM) of one EDG with a second EDG operable and the third EDG inoperable but functional and available.

2. Description of Circumstances

On May 10, 1993, at 1930 hours, the No. 33 EDG was declared inoperable because the 12 year PM frequency recommended by the manufacturer has not been followed. The Authority will begin the 12 year PM on 33 EDG at 0700 hours on June 7, 1993. Prior to commencing this 12 year PM the Authority will perform the required PM on 31 and 32 EDGs (the PM for 32 EDG will come due during the time when the PM on 33 EDG is scheduled to be performed). This action will serve to provide additional assurance of the reliability of 31 and 32 EDG and thereby reduce the overall shut down risk while performing the 12 year PM on 33 EDG.

As discussed above, the 33 EDG is considered inoperable because the 12 year PM frequency recommended by the manufacturer has not been followed. However, 33 EDG is functional and available. At 0700 hours on June 2, 1993 the Authority is scheduling the quarterly PM of 31 EDG which is scheduled to be completed by 1900 hours on June 2, 1993. During this 12 hour time period 33 EDG will still be inoperable, but functional and available, and 31 EDG will be inoperable due to the PM. At 0700 hours on June 3, 1993 the Authority will perform the annual PM of 32 EDG which is scheduled to be complete at 0700 hours on June 5, 1993. During this 48 hour time period 33 EDG will still be inoperable, but functional and available, and 32 EDG will be inoperable due to the PM. Therefore, the total time that two EDGs are expected to be inoperable is 60 hours.

This request is necessary because the required PM on 32 will come due before the 12 year PM on 33 EDG can be completed.

Since the Authority determined that the 12 year PM must be performed there has not been adequate time to plan and stage material to perform that PM before the PM on 32 EDG becomes due.

3. Compensatory Actions

On May 28, 1993 the Authority completed the quarterly PM of 33 EDG.

As additional compensating measures, the Authority will not start the PM on 31 or 32 diesel unless the following is in effect:

- (1) Two (2) 138 kilovolt (KV) and two (2) 13.8 KV feeders are operable and available.
- (2) The Appendix R diesel generator is operable.
- (3) No activities will be permitted that could perturb the Indian Point 3 electrical distribution system.

In addition, the same compensatory actions specified in the Westinghouse Standard Technical Specifications for less than the required EDGs operable in Mode 5 and 6, will be followed.

These actions include:

No core alterations will be performed,

no positive reactivity changes will be made,

there will be no movement of irradiated fuel,

there will be no crane operations with loads over the spent fuel pool,

the reactor coolant system will remain depressurized and vented with greater than a 2.00 square inch vent,

the reactor coolant system level will be maintained above the reduced inventory level (that is above 66 feet).

4. Safety Significance and Potential Consequences

The request for enforcement discretion for Technical

Specification Section, 3.7.F.4, to allow one inoperable and one functional EDG is justified, in part, by the diversity of the Indian Point 3 electrical distribution system. This diversity includes independent offsite sources including the 138 KV and 13.8 KV feeders that were mentioned previously. If the offsite power sources become unavailable, there are emergency power sources on the IP3 site. These include the three EDGs and an alternate onsite source of power for safe shutdown loads via the Appendix R diesel generator (ARDG) mentioned previously. The three EDGs feed the 480 volt safeguard buses directly. The ARDG, rated 2.5 MW, can feed any 480 volt safeguard bus via the appropriate 6.9 KV bus.

Any two EDGs feeding their respective 480 volt bus, as a backup to the normal standby AC power supply, are capable of supplying the power requirement of one minimum required set of safeguards equipment necessary to mitigate the consequences of design basis events. One EDG or the ARDG is capable of maintaining the plant in the cold shutdown condition.

One EDG and the ARDG will be operable and another EDG will be functional and available at all times for the proposed 48 hour period when preventive maintenance is performed on 31 and 32 EDGs as per the indicated schedule. 33 EDG will be inoperable but functional and available during this period. It has been declared inoperable because the 12 year preventive maintenance frequency recommended by the manufacturer has not been followed. It is considered functional and available based on:

- (1) Preventive maintenance performed on May 28, 1993 and testing performed on May 30, 1993 to demonstrate its availability to start and load as required,
- (2) in the last 100 start demands there was only one failure. In the last 100 load demands there was only one failure,
- (3) no known defects on 33 EDG components that could otherwise render it inoperable.

Performing the required preventive maintenance on 31 and 32 EDGs prior to commencing the 12-year overhaul on 33 EDG will provide additional assurance of equipment reliability, thereby reducing overall shut down risk.

There would be no significant safety consequences as a result of granting this request. As a practical matter, two EDGs will be fully capable of performing their safety

function throughout the period of the request. The Authority concludes, that based on the combination of available offsite power sources, onsite power sources, and compensatory actions, this request will not result in a significant reduction of safety.

5. Duration of Request

The Authority expects to require the enforcement discretion for one 12 hour period while surveillance is being performed on 31 EDG and for one 48 hour period while surveillance is being performed on 32 EDG. In order to allow for unforeseen difficulties the enforcement discretion is being requested for two consecutive periods not to exceed the duration of 24 hours and 72 hours respectively. The first period is to start when the 31 EDG is removed from service to perform the quarterly PM and end when 31 EDG is return to service after retesting is completed. The second period will start when 32 EDG is removed from service to perform the annual PM and end when the 32 EDG is returned to service after retesting is completed.

6. Significant Hazards Consideration

The Authority has concluded that this request does not involve a significant hazard consideration in that the request would not:

- (i) involve a significant increase in the probability or consequences of an accident previously evaluated. As discussed in Section 4, permitting operation of the plant in the cold shutdown condition with one operable and one functional EDG would not involve an increase in the probability of occurrence nor the consequences of a design basis accident during the period of this request,
- (ii) create the possibility of a new or different kind of accident from those previously evaluated. The proposed request does not involve a physical change to any plant systems or components. The proposed request does not involve any operations that are different from those described in the FSAR or in plant procedures,
- (iii) involve a significant reduction in the margin of safety. As discussed in Section 4, approval of this request involves an insignificant reduction in the margin of safety because a second EDG will

be functional and available, the availability of plant offsite and onsite power sources and the short duration of the request.

In summary this request for enforcement discretion will permit temporary relaxation of the IP3 Technical Specification which requires two operable emergency diesel generators during all conditions including cold shutdown for two periods not to exceed the duration of 24 hours and 72 hours respectively.

7. Environmental Consequences

No adverse environmental consequences will result from approval of this request.

8. Plant Operating Review Committee (PORC) Review

The Plant Operating Review Committee has reviewed and approved this request.