

POWER AUTHORITY OF THE STATE OF NEW YORK

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& GENERAL COUNSEL

July 31, 1981
IPN-81-53

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-~~280~~ 286
Order Confirming Licensee Commitments
on Post-TMI Related Issues



Dear Sir:

The Power Authority of the State of New York (Authority) has received and reviewed the subject Order, effective as of July 10, 1981. This Order requires the Authority to "...satisfy the specific requirements described in the attachment to [the] Order (as appropriate to the licensee's facility) as early as practicable but no later than 30 days after the effective date of the ORDER."

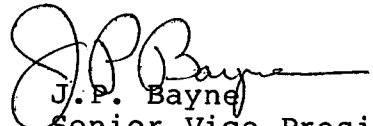
The Authority understands, based on discussions with the NRC Staff, that the subject order confirms only those commitments which the Authority has made in its December 30, 1980 (IPN-80-117) and February 27, 1981 (IPN-81-16) responses to NUREG-0737 to the extent that they are also specifically identified in the attachment to the subject order. Therefore, the Authority considers that it will be in full compliance with the July 10, 1981 Order by either fulfilling its commitments or otherwise obtaining NRC Staff approval for modification of those commitments. The acceptability of the Authority's responses to the specific requirements contained in the order attachment has not been fully addressed by the Commission to date. It is our understanding that final acceptance is deemed unnecessary for purposes of complying with the July 10, 1981 Order.

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Should the Commission adopt an interpretation of the July 10, 1981 Order which is different from that set forth above, the Authority reserves the right to request a hearing within a reasonable time following receipt of written notification of such different interpretation by the Commission. Since this letter is submitted prior to the time provided by law to request a hearing, this letter shall constitute a request for a hearing upon written notification from the Authority to that effect.

Very truly yours,



J.P. Bayne
Senior Vice President
Nuclear Generation

cc: Mr. T. Rebelowski
Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, New York 10511

NUREG 0737 REQUIREMENTS

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>
I.A.1.1	STA	ALL	(a) Provide STA coverage by degreed individuals (or equivalent), trained to licensee's program.	1/1/81
			(b) Submit description of current training program and demonstrate compliance with 10-30-79 letter.	1/1/81
			(c) Submit description of long term training program.	1/1/81
.A.2.1	Reactor Operator Qualification	ALL	Submit description of and implement Upgraded Training Program.	8/1/80
.C.1	Accident Procedures	ALL	(a) Submit reanalyses of inadequate core cooling and propose guidelines for emergency procedures, OR propose schedule and justify delays.	1/1/81
			(b) Submit reanalysis of transients and accidents for emergency procedures, OR propose schedule and justify delays.	1/1/81
.C.5	Feedback of Operating Experience	ALL	Implement procedures for feedback of operating experience (no documentation submittal is required).	1/1/81
.C.6	Correct Performance or Operating Activities	ALL	Implement procedures to verify correct performance of operating activities (no documentation submittal is required).	1/1/81

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>
II.B.2	Shielding	ALL	(a) Have available design details for vital area modifications.	1/1/81
			(b) Submit technical deviations to staff positions.	1/1/81
II.B.3	Post-Accident Sampling	ALL	Submit description of deviations from staff positions.	1/1/81
II.B.4	Training to Mitigate Core Damage	ALL	(a) Have available for review a training program for mitigating core damage (no documentation submittal required)	1/1/81
			(b) Implement training program (no documentation submittal required).	4/1/81
II.D.1	Performance Testing of RV/SRV's	ALL	(a) Submit test program (both BWR/PWR's).	7/1/80 (PWRs) 10/1/80 (BWRs)
			(b) Submit qualification program for PWR's block valve.	1/1/81 (PWRs)
II.E.1.2	Aux Feed Initiation and Flow	PWRs	(a) Submit final design and documentation on safety grade flow indication.	1/1/81
			(b) Submit final design and documentation on safety grade flow initiation.	1/1/81
II.E.4.2	Containment Isolation	ALL	(a) Submit documentation justifying minimum containment pressure setpoint for isolation of non-essential penetrations.	1/1/81
			(b) Submit statement that purge valves not meeting CSB 6-4 (or interim position) are sealed and verification is performed every 31 days.	1/1/81

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Due Dates</u>
II.F.1	Post-Accident Monitoring	ALL	<p>a. For noble gas monitor and Iodine/particulate sampling and analysis submit description and justification for deviations from staff requirements.</p> <p>b. Have available the final design information for noble gas monitor and iodine/particulate sampling and analysis.</p>	<p>1/1/81</p> <p>1/1/81</p>
II.F.2	Inst. for Inadequate Core Cooling	ALL	Submit a report detailing the planned instrumentation system for monitoring inadequate core cooling.	1/1/81
II.K.2.10	Antic. Trip on LOFW and TT	B&W	Submit final design for anticipatory trip as described in NUREG 0737.	1/1/81
II.K.2.13	Thermal Mechanical Report	B&W	Submit report on effects of Hi Pressure Injection on vessel integrity for SB LOCA with no Aux Feedwater.	1/1/81
II.K.3.2	PORV/SV Failures	PWR	Submit report on SB LOCA and probability of failure of PORV/SV/RV.	1/1/81
II.K.3.3	SRV/SV Failures & Challenges	ALL	Submit report (historical and annually thereafter) of SRV/SV failures and challenges.	1/1/81
II.K.3.7	PORV Opening Probability	B&W	Submit report on the probability of a PORV opening during an over-pressurization transient.	1/1/81
II.K.3.9	PID Controller Modification	Selected <u>W</u> plants	Modify the Proportional Integral Derivative Controller (as recommended by <u>W</u>). Advise NRC when modification is completed.	12/1/80
II.K.3.12	Anticipatory Trip on Turbine Trip	<u>W</u>	Submit confirmation of Anticipatory Trip. If not currently implemented, submit modification design and schedule for implementation.	1/1/81

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc Subm Dates</u>
II.K.3.13	Separation of HPCI/RCIC Initiation Levels; Auto Restart of RCIC	BWRs w/HPCI/RCIC	Submit results of evaluation and proposed modification as appropriate.	1/1/81
II.K.3.16	Reduce Challenges to RV's	BWR	Submit report on actions planned to reduce RV challenges.	4/1/81
II.K.3.17	ECCS System Outages	ALL	Submit report on ECCS outages and propose changes to reduce outages.	1/1/81
II.K.3.18	ADS Logic Modifications	BWR	Submit report of feasibility of ADS system logic changes to eliminate need for manual actuation.	4/1/81
II.K.3.21	CSS/CPCI Restart	BWR	Submit report of evaluation, proposed modifications and analysis to satisfy staff positions.	1/1/81
II.K.3.22	RCIC Suction	BWR w/RCIC	Implement procedures and document verification of this change.	1/1/81
II.K.3.27	Common Reference for H ₂ O Level Instruments	BWR	Implement change and submit documentation of changes.	1/1/81
II.K.3.29	Isolation Condensor Performance	BWR w/ICs	Submit evaluation of I.C. performance.	4/1/81
II.K.3.30	SB LOCA Methods	ALL	Submit outline of program for model.	11/15/80
II.K.3.44	Fuel Failure	BWR	Submit evaluation to verify no fuel failure.	1/1/81
II.K.3.45	Manual Depressur- ization	BWR	Submit evaluation on other than ADS method for depressurization.	1/1/81

<u>Item</u>	<u>Title</u>	<u>Applicability</u>	<u>Specific Requirement</u>	<u>Impl/Doc</u> <u>Subm Due Dates</u>
III.D.3.3	Improved Implant Iodine Monitoring	ALL	Have available means to accurately measure airborne radioiodine implant during an accident.	1/1/81
III.D.3.4	Control Room Habitability	ALL	a. Submit control room habitability evaluation information. b. Submit modifications necessary to assure CR habitability with a schedule for completion.	1/1/81 1/1/81