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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

50-286

Subject: Proposed Steam Generator Generic Requirement
Comments on Value - Impact Study

Dear Sir:

The Power Authority of the State of New York has reviewed the draft value impact analysis regarding proposed generic steam generator requirements prepared by Science Applications, Inc. and appreciates this opportunity to comment.

The Power Authority believes that value impact analysis is a preferred method of evaluating proposed regulatory requirements and that the SAI report is an excellent example of this technique. Programs which support steam generator tube integrity have been a continuing concern of the Power Authority since its operation of Indian Point 3 began in 1976. As a result of the Authority's evaluation of the effectiveness of certain of these proposed requirements, many had already been incorporated into Indian Point 3's operating and maintenance practices over the past few years. Others, such as the secondary side inspection, are planned during the present plant outage.

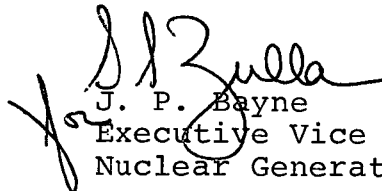
In general, as a result of the Power Authority's review, we concur with the SAI findings as to the relative effectiveness of the proposed requirements. A secondary water chemistry program, extensive eddy current inservice inspections with state-of-the-art techniques, condenser tube testing, secondary side inspections for loose parts and effective QA procedures to minimize the potential for the introduction of foreign objects into the primary or secondary systems are all part of Indian Point 3's existing program. The remainder of the proposed requirements, however, will not improve the operating performance of the steam generators or measurably reduce the probability of a steam generator tube rupture.

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With regard to the secondary water chemistry program, some additional comments are offered. The Power Authority recognizes the impact that impurities in the secondary water can have on steam generator tube corrosion, and presently has a water chemistry program in place which was developed based upon vendor recommendations. While the Authority is endeavoring to reduce the concentrations of impurities to levels within those of the Steam Generator Owners Group guidelines, it is apparent that major plant modifications will be required to reduce all parameters to the desired levels. Condenser retubing, the installation of a condensate polisher, and the replacement of copper bearing components in the feedtrain are all being evaluated by the Authority as part of its effort to improve secondary water chemistry. Such modifications involve expenditures of millions of dollars and are typical of the modifications required of a large number of plants which were not designed to meet the proposed chemistry controls. We believe that consideration of these costs is warranted in Section IV.5 of the SAI report.

If you have any questions regarding these comments, please contact Mr. P. Kokolakis of my staff.

Very truly yours,


J. P. Bayne
Executive Vice President
Nuclear Generation

cc: Resident Inspector's Office
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