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New York Power Authority

J. Phillip Bayne
Executive Vice President
Nuclear Generation

April 17, 1985
IPN-85-20

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

Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Reference: (1) J.C. Brons Letter to the Director of Nuclear Reactor Regulation, dated December 15, 1982

Subject: Indian Point 3 Nuclear Power Plant
Integrated Leak Rate Test Schedule

Dear Sir:

The initial 120 month inservice examination and testing interval for the Indian Point 3 Nuclear Power Plant (IP-3) began with commercial operation in August, 1976. Nominally, the first ten-year inservice inspection outage would be conducted during an outage in 1986 and the third containment Type A test would be performed in accordance with 10 CFR 50, Appendix J, Section D.1.a.

Due to an unexpectedly lengthy refueling and steam generator repair outage in 1982-1983 (14 months), the New York Power Authority intends to extend the first inspection interval to the Cycle 5/6 refueling outage. This outage is currently scheduled to commence during the first quarter of 1987. This extension is permitted by Section XI of the ASME Code, IWA-2400.

The Authority intends to perform the third Type A containment integrated leak rate test (ILRT) during the ten-year inservice inspection outage. This schedule conforms to the provisions of Appendix J to 10 CFR 50 as well as the plant Technical Specifications, Section 4.4.A.3, which specify that the third containment ILRT be conducted during the ten-year inservice inspection outage.

The previous containment ILRT was performed in August, 1982. Reference (1) provided the results of this test which demonstrated leakage rates well below the acceptance criterion of Technical Specification 4.4.A.2. This criterion is more conservative than

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the current ILRT acceptance criterion of Revision 5 of the Westinghouse Standard Technical Specifications (STS).

Additional assurance of containment integrity is provided by the weld channel and penetration leak detection system. This system provides a means to continuously pressurize the positive pressure zones incorporated into the containment penetrations and the channels over the containment steel liner welds. This pressure is monitored. Degradation of the containment liner welds or the penetrations serviced by this system, as evidenced by increased gas consumption, is restricted by Technical Specification 4.4.B.1.

The plant design features discussed above as well as the favorable results of the previous ILRT support the schedule for the third ILRT. It is noted that the IP-3 Technical Specifications do not specify intervals between ILRT's, although we make every attempt to schedule the tests at equal intervals during the nominal 10 year service period.

The Authority discussed this matter with your staff on April 5, 1985, and provides this letter for your information only. We trust you will find this schedule acceptable.

Sincerely,

C. M. Wilverding

for J.P. Bayne
First Executive
Vice President
Chief Operations Officer

cc: Resident Inspector's Office
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U.S. Nuclear Regulatory Commission
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