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New York Power Authority

August 14, 1986
IPN-86-38

John C. Brons
Senior Vice President
Nuclear Generation

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

Attention: Mr. Steven A. Varga, Director
PWR Project Directorate No. 3
Division of PWR Licensing-A

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events

References:
1. Letter from Mr. J. C. Brons to Mr. S. A. Varga, dated January 23, 1986.
2. Letter from Mr. J. D. Neighbors to Mr. J. C. Brons, dated June 10, 1986 entitled, "Projected Values of Material Properties for Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events."

Dear Sir:

The Authority submitted the present and projected values of reference temperatures (RT_{PTS}) of reactor vessel beltline materials for Indian Point 3 (IP-3) in Reference 1. The NRC reviewed this submittal and provided their safety evaluation in Reference 2. The purpose of this letter is to respond to the NRC's safety evaluation.

The NRC safety evaluation concludes that the Authority's use of a 65% capacity factor in calculating the projected values of RT_{PTS} is acceptable. The NRC safety evaluation also states that if any fuel cycle (projected or achieved) exceeds a 65% capacity factor, the Authority is required to provide the NRC with a re-evaluation of the projected RT_{PTS} values to the end of license.

The Authority does not agree with the NRC position stated above. The PTS Rule required that Licensees provide the NRC with projections of RT_{PTS} values. It is necessary to project the plant's capacity factor to the end of its license. The Authority in Reference 1 provided the NRC with

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realistic projections of IP-3's RT_{PTS} values based on scheduled outages. The Authority anticipates that various fuel cycles will have a greater capacity factor than 65%. However, it is also known that there are scheduled outages such as the 10 year inservice inspection and steam generator outages which will cause IP-3 to have a capacity factor of less than 65%. It is the Authority's understanding that the intent of the PTS rule is that a cummulative capacity factor should be used in calculating RT_{PTS}. Therefore, the Authority has determined that an appropriate value for the IP-3 cummulative capacity factor is 65%. A revision to the RT_{PTS} calcualtion based on a single fuel cycle capacity factor would be inappropriate.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,

John C. Brons
Senior Vice President
Nuclear Generation

cc: Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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Mr. J. D. Neighbors, Senior Project Manager
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