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January 17, 1990  
IPN-90-003

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555  
Attn: Document Control Desk

Subject: **Indian Point 3 Nuclear Power Plant**  
**Docket No. 50-286**  
**Second Ten Year Interval Inservice Testing Program**

- References:
1. NRC Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs".
  2. NYPA letter, J. C. Brons to NRC, "Generic Letter 89-04; Inservice Testing Program", dated October 3, 1989 (IPN-89-061).
  3. NYPA letter, J. C. Brons to NRC, "Inservice Testing Program; Second Ten Year Interval", dated May 3, 1988 (IPN-88-016).

Dear Sir:

In response to Reference 1, the Authority reviewed the Indian Point 3 Inservice Testing (IST) Program for the second ten year interval. The results of this review were submitted to the NRC in Reference 2. The purpose of this letter is to submit the revised IST Program and relief requests. The revised Program is included in Attachment I. This Program supersedes the Program submitted in Reference 3. This revised Program includes relief requests that were contained in Reference 3 and are not related to a position established by Generic Letter 89-04. The following paragraphs contain updates and additional information concerning the Authority's response to the Generic Letter positions contained in Reference 2.

The Authority takes exception to Position 8 of the Generic Letter (Reference 1), which pertains to the starting point for time period in the Technical Specification Action Statements. The Authority has always considered the operability of vital plant equipment, both in the day to day operation, and periodic testing of system components. The Authority has always taken prudent action to resolve issues potentially affecting the operability of safety related components. In reference to the IST Program, the Authority believes that the acceptance criteria in the ASME Code are conservative for determining component operability. The ASME Code requires component performance data to be trended, and if changes are observed, an evaluation is performed. The Code requires that this evaluation be performed within a specific time limit. Position 8 of the Generic Letter proposes to eliminate this Code allowed evaluation time period. The Authority disagrees with this and believes that implementation of this requirement would impose unnecessary cycling of components and challenges to safety related systems that could lead to an overall degradation of safety.

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impose unnecessary cycling of components and challenges to safety related systems that could lead to an overall degradation of safety.

The Authority will continue to operate all systems in a safe and prudent manner and trend performance data in accordance with the IST Program. Where component performance, as observed during operation or through special tests, indicates that the component is no longer performing within the required bounds, the component will be declared inoperable and the applicable Limiting Condition Of Operation is entered. If however, there is an observed change in the performance data within the required bounds, an engineering evaluation will be performed within the time period specified in the Code to determine what remedial action, if any, is required.

As stated in Reference 2, the Authority is investigating alternate testing and inspection techniques for cases when full flow testing of check valves or inspection by disassembly is impractical. The Authority will also participate in any industry initiatives to investigate the state of the art methods e.g., electronic non-obtrusive sensors, radiography or remote visual inspection. Subsequently, alternate testing and inspection techniques that are deemed appropriate for Indian Point 3 will be incorporated in the IST Program.

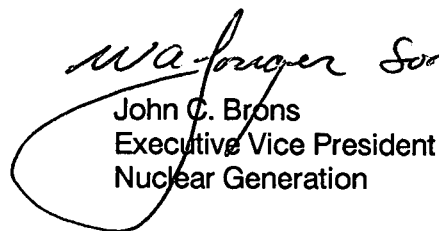
It should be noted that the Indian Point 3 Technical Specifications (TS) contain the acceptance criteria for a combined leakage rate and do not specify leakage rate for individual Pressure Isolation Valves (PIVs). Therefore, the TS requirements for PIVs are not referenced in the IST Program as requested by Position 4.

As requested by Position 10 of Reference 1, all valves which are designated as containment isolation valves are included in the IST Program as Category A or A/C valves. For cases where the system piping configuration makes the measurement of individual leakage rates impractical, valves will be leak-tested in multiple valve arrangements and a maximum permissible leakage rate will be applied to each combination of valves. Relief Request No. VR-33 is included in the IST Program for this purpose.

The Authority may take additional exception to certain provisions of the Generic Letter (Reference 1) and reserves the right to pursue all available appeal options under 10 CFR 50.109.

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

Very truly yours,

  
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Encl.

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