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**John C. Brons**  
Executive Vice President  
Nuclear Generation

December 21, 1990  
IPN-90-058

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  
Response to Generic Letter 90-06

Reference: NRC Generic Letter 90-06, "Power-Operated Relief Valve and Block Valve Reliability and Additional Low-Temperature OverPressure Protection For Light-Water Reactors."

Dear Sir:

In the referenced Generic Letter (GL), the NRC requested licensees to take actions to improve the reliability of power-operated relief valves (PORVs), block valves (BVs) and the low-temperature overpressure protection system (LTOPS).

The Authority has reviewed the GL and confirms that the PORVs and BVs are included in the IP-3 Master Equipment List as Category I safety related valves and are part of the Quality Assurance (QA) Program. This QA Program is in compliance with 10 CFR 50 Appendix B. The Authority performs routine preventive maintenance on PORVs and BVs and will implement a Maintenance/Refurbishment Program consistent with the GL recommendations by the end of the cycle 8/9 refueling outage. This program will meet the intent and the schedule provided in GL 90-06 and will be developed using manufacturers' guidelines and recommendations that are available and appropriate. All replacement parts, spares and complete components for PORVs, BVs and the associated control system are procured in accordance with the original construction codes and standards.

The Authority also confirms that the IP-3 PORVs and BVs are included in the Inservice Testing (IST) Program in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. The Authority is evaluating adding the nitrogen supply system valves for the PORVs to the IST Program and will notify the NRC of the results of this evaluation by the next refueling outage.

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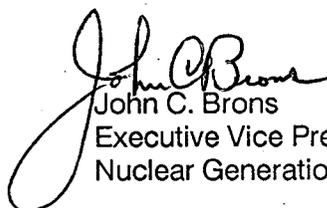
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In the current refueling outage, the PORVs and BVs were stroke tested in the hot shutdown condition. The Authority will stroke test the PORVs and BVs during cooldown, prior to establishing conditions requiring use of the PORVs for low temperature overpressure protection. This will be done in accordance with the frequency stated in the IST Program, at least once per refueling cycle. Testing of the PORVs will be conducted with the BVs closed and the BVs will be tested with the PORVs closed. Procedures for these tests will be implemented during the cycle 8/9 refueling outage. The BVs are also included in the Motor-Operated Valve (MOV) Test Program which was developed in response to GL 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance."

The Authority is evaluating the Technical Specification changes proposed in GL 90-06. The Authority will submit the Technical Specification changes that are deemed appropriate for IP-3 by the end of cycle 8/9 refueling outage in accordance with the schedule provided in GL 90-06.

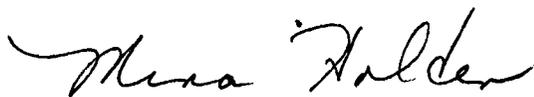
If you have any questions regarding this matter, please contact Mr. P. Kokolakis.

Very truly yours,

  
John C. Brons  
Executive Vice President  
Nuclear Generation

STATE OF NEW YORK  
COUNTY OF WESTCHESTER

Subscribed and sworn to before me  
this 21<sup>st</sup> day of December



1990  
**MINA HOLDEN**  
NOTARY PUBLIC, State of New York  
Westchester County  
No. 4829150  
My Commission Expires Aug. 31, 1991

cc: U. S. Nuclear Regulatory Commission  
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