



**Ralph E. Beedle**  
Executive Vice President  
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January 29, 1993  
IPN-93-006

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

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

Reference: NRC SE, R. A. Capra to R. E. Beedle dated November 7, 1991,  
"Safety Evaluation of Second Ten-Year Interval Inservice Inspection Plan and  
Associated Relief Requests for Indian Point Nuclear Generating Unit No. 3,"  
(TAC No. 72247).

Dear Sir:

In the referenced Safety Evaluation (SE)/Technical Evaluation Report (TER), the NRC reviewed and evaluated the Second Ten-Year Interval Inservice Inspection (ISI) Program and the relief requests for the Indian Point 3 Nuclear Power Plant.

Subsequent to the receipt of the SE, the Authority had a meeting in December 1991 and several conference calls with the NRC and the Idaho National Engineering Laboratory (INEL) Staff (NRC contractor for the ISI Program). The purpose of the meeting and the conference calls was to discuss and clarify certain items addressed in the SE. In the referenced SE, the NRC staff stated that the IP-3 ISI Program was not in full compliance with 10 CFR 50.55a due to an unacceptable application of the exclusion criteria to Class 2 piping welds in the Safety Injection and the Containment Spray Systems. Certain relief requests were also denied.

The Authority believes that the ISI Program complies with the requirements of 10 CFR 50.55a and ASME Section XI. Details of the Class 2 Piping Volumetric Examination Plan are provided in Attachment 1. This Attachment includes the total number of welds for the Residual Heat Removal, Safety Injection and the Containment Spray Systems that are eligible for volumetric and surface examinations and the number of welds that will be inspected during

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the Second Ten-Year Interval. The Authority made the determination for the number of eligible welds using the exemptions allowed by 10 CFR 50.55a, in accordance with ASME Section XI, paragraph IWC-1220 and Table IWC-2500-1. ASME Section XI exemption criteria do not require any weld inspections for the Containment Spray System. However, the Authority commits to inspect the first weld inside Containment on the Containment Spray System.

The Authority is submitting revised relief requests in Attachment II. A brief discussion of the revised relief requests is given below:

Relief Requests 5 and 15: Changed format from original submittal. Separated relief requests by Code Category and item number. New numbers are 5, 15 and 21 to 29. Relief is requested.

Relief Requests 6 and 10: Formally documents the agreement reached in December 1991 Meeting. Relief is requested without conditions.

Relief Request 9: Provides drawings showing obstruction which prevents the Authority from meeting the SE/TER conditions. Relief is requested without conditions.

Relief Request 12: Provides evaluation as required by Code Case N-481.

Relief Request 13: Explains Authority's Preventive Maintenance Program for Reactor Coolant Pump motors. Relief is requested.

Hydro Relief Request 13: Request that the exemption allowed for non redundant systems shall be applied to redundant systems also. Buried component drawings are attached. This relief request is similar to that for the first ten year interval and is addressed in the evaluation section of the NRC SE/TER. Relief is requested.

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

Very truly yours,

*R. Beedle* by direction

Ralph E. Beedle

att: as stated

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