



**New York Power
Authority**

J. Phillip Bayne
Executive Vice President
Nuclear Generation

September 30, 1983
IPN-83-84

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

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Radiological Environmental Technical Specifications

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating License", together with forty (40) copies of Attachments I and II thereto, comprising a statement of the proposed changes to the Technical Specifications and the associated safety evaluation.

This application seeks a total revision of Appendix B to the Operating License and to amend Sections 6.5, 6.8, 6.9, and 6.10 of Appendix A to the Operating License in response to the Commission's September 7, 1982 letter. This letter requested the Authority to propose Technical Specification changes reflecting draft revision 3 of NUREG-0472.

By letter dated June 6, 1983, (IPN-83-54) the Authority transmitted the standard Technical Specification format of the Indian Point 3 Radiological Environmental Technical Specification (RETS) for technical review and comment. Your letter dated August 2, 1983 provided the NRC comments on the standard Indian Point 3 RETS. All comments centered on discrepancies between the Authority's version of the RETS and the model RETS presented in NUREG-0472. Your letter offered two options, either revise the Indian Point 3 RETS to reflect the model RETS or provide justification of the discrepancies. Enclosure 1 to this letter presents the Authority's justifications of the discrepancies between the Indian Point 3 RETS and the model RETS. Several of the justifications warrant modification to the Offsite Dose Calculation Manual (ODCM). The revisions to the ODCM are presented in Enclosure 2 to this letter. The proposed Technical Specifications presented in Attachment I to the "Application for Amendment to Operating License" reflect the requirements of the standard

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Indian Point 3 RETS in a format consistent with the existing Indian Point 3 Technical Specifications.

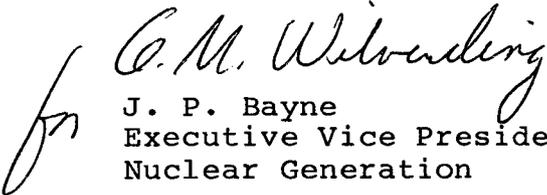
Implementation of the RETS will require the Authority to shift from its existing set of records to another of a different type and format. In addition, semiannual reporting requirements make it necessary to implement the RETS on a fixed date starting at either the beginning or the midpoint of a year. The Authority intends to implement the environmental portion of the RETS by January 1, 1984. Implementation of the remaining portion of the RETS is scheduled for January 1, 1985.

The Authority interprets this application to constitute a class III amendment as defined by 10 CFR 170.22. Enclosed, therefore is a check in the amount of \$4,000 which the Authority pays under protest pending final determination of the legality of the fee schedule.

In accordance with the requirements of 10 CFR 50.91 a copy of this application for amendment to the Operating License and the associated attachments is being submitted to the designated New York State official.

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

Very truly yours,

 J. P. Bayne

Executive Vice President
Nuclear Generation

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