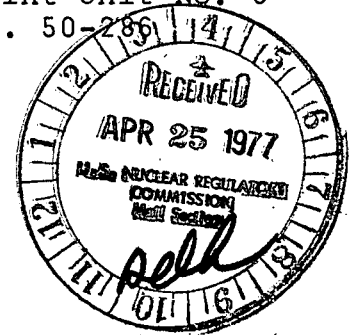


William J. Cahill, Jr.  
Vice President

Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-3819

April 20, 1977  
Re: Indian Point Unit No. 3  
Docket No. 50-286

Director of Nuclear Reactor Regulation  
ATTN: Mr. Robert W. Reid, Chief  
Operating Reactors Branch No. 4  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Reid: **REGULATORY DOCKET FILE COPY**

Your letter dated March 8, 1977 requested that we submit either revised technical specification limits for  $F_{\Delta H}^N$  to account for the effects of fuel rod bowing on departure from nucleate boiling (DNB) or an explanation of why such revised limits are not required for Indian Point Unit No. 3.

In response to your letter, we are submitting 3 originals and 40 copies of the enclosed Application for Amendment to Operating License proposing technical specification changes revising limits for  $F_{\Delta H}^N$ . The revised limits include the following generic margins for Indian Point Unit No. 3 in % DNB.

Design Pitch Reduction	3.3
Thermal Diffusion Coefficient (0.038 vs 0.019 design)	3.0
95x95 criteria, DNBR (1.24 vs 1.30 design)	4.8
Power Spike Penalty (Densification)	7.0
Total	18.1

In addition, the Indian Point Unit No. 3 primary coolant flow rate has been measured to be between 8.6 and 9.2 percent above design with a measurement uncertainty of less than two percent for secondary side calorimetrics and measured vessel  $\Delta T$ , and 3.5 percent for elbow tap readings. Another DNB margin is reduced core inlet fluid temperature. The uncertainty associated with this measurement is 1°F. However, to take credit for reduced core inlet fluid temperature, the full power average coolant temperature ( $T'$ ) must be reduced in the over-temperature  $\Delta T$  trip. In addition reducing  $T'$  in the over-temperature  $\Delta T$  trip will, with no reduction in the core inlet fluid temperature, also provide margin to DNB.

Rather than taking credit at this time for DNB margins, the credit will only be taken for short periods of time, if required, and will not be allowed to exceed the  $F_{\Delta H}^N$ .

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PDR

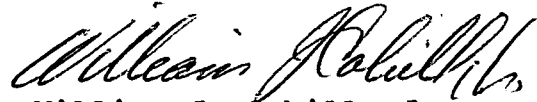
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penalty. When credit for DNB margins is taken, a verification measurement schedule will be in force.

The proposed Technical Specification changes reflect the Basis set forth in the NRC's Interim Safety Evaluation Report on Effects of Fuel Rod Bowing on Thermal Margin Calculations for Light Water Reactors, Revision I, February 16, 1977. A copy of which was attached to your letter of March 8, 1977.. In addition we have proposed changes to Section 2.3 of the Technical Specification to achieve a greater degree of conformity with the Standard Technical Specifications thereby eliminating areas of possible ambiguity. These changes will provide the required DNB margin for fuel rod bowing as well as maintain the ability to operate the facility in a flexible and efficient manner.

We would be glad to discuss these changes with you, if you so desire.

Very truly yours,



William J. Cahill, Jr.  
Vice President

RR:ms

Copy to:

George T. Berry  
General Manager and Chief Engineer  
Power Authority of the State of N.Y.  
10 Columbus Circle  
New York, N. Y. 10019

Hon. George V. Begany  
Mayor, Village of Buchanan  
Buchanan, New York, 10511

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