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COMMISSIONER OF COMMERCE



State of New York
ATOMIC ENERGY COUNCIL
Department of Commerce
99 Washington Avenue
Albany, New York 12210



STAFF COORDINATOR
DR. WILLIAM SEYMOUR
DEPUTY COMMISSIONER
DIV. OF INDUSTRIAL SCIENCES
AND TECHNOLOGIES

REGULATORY DOCKET FILE COPY May 16, 1975

50 - 286

Mr. George Lear, Chief
Operating Reactors Branch #3
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Lear:

The New York State Commerce Department's Division of Industrial Sciences and Technologies has reviewed the Consolidated Edison submittal of emergency core cooling performance submitted as part of Supplement 29 of the Indian Point #3 FSAR. Based on this review the Loss of Coolant Accident analysis appears to be in conformance with the requirements of 10 CFR 50.46 and Appendix K.

The following comments are submitted for consideration in your evaluation of the proposed Technical Specification changes which are included in the Con Edison submittal.

1. Technical Specification 3.10.4.3 states that control bank insertion shall be further restricted if the measured control rod worth of all rods is less than the reactivity required to provide the design value of available shutdown (worst case, stuck rod). It is recommended that this specification be more specific as to what is meant by restricted.
2. The justification for Technical Specification 3.10.5.2 (use of 85% overpower trip and normal overpower ΔT and overtemperature ΔT trips for all misaligned rod conditions) does not appear to be discussed in the FSAR. The basis and justification for using these setpoints should be presented.
3. Technical Specification 3.10.8 should clearly state that if a rod fails to meet the required rod drop time, it should be considered an inoperative rod.
4. Technical Specification 3.10.7 allows normal operation with an inoperable rod and requires a safety analysis within 30 days. It is felt that this Technical Specification should specifically state that the rod misalignment limitations of Specification 3.10.5 must be adhered to while the rod is inoperable.

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5. In the FSAR the stuck rotor loss of flow analysis used a longer time delay than the electrical loss of flow analysis. These delays do not appear to be consistent.
6. Page 14.1.6-4 of the FSAR indicates that the flow coastdown curves are analytically determined. If these curves have been experimentally determined on similar systems it should be so indicated; otherwise it appears as if confirmatory testing should be required.
7. Technical Specification 3.10.6.1 is inconsistent with the FSAR p. 14.1.3-2. These sections relate to the backup instrumentation to be used if a rod position indicator channel is out of service.
8. It is recommended that Technical Specification 3.10.9 require the logging of control rod positions following a specified number of steps of rod movement when a rod position deviation monitor is inoperable. The current once-per-shift logging requirement should be retained and the current 10% load change logging requirement should be deleted. This change will provide a more positive control of rod misalignments when a rod position deviation monitor is inoperable.
9. The reporting requirement in Specification 3.10.11 appears to be partially in conflict with Technical Specification 6.12.
10. Technical Specification 3.3.A.1.c requires an increase of 50 ft³ in accumulator water volume. It is not clear what the justification is for this change.
11. Technical Specification 3.10.7 allows operation with one inoperable full length rod. It is not clear how inoperable part length rods are to be treated.
12. The basis for certain limits in the Technical Specifications (indicated axial flux difference, use of partial flux map, and allowable quadrant tile) could not be located. It is felt that the justification for all Technical Specification changes should be discussed, or referenced, in the Technical Specification Basis.
13. Specification 3.10.4 does not describe "overlapping banks" as stated on page 3.10-14 of the Technical Specification Basis.
14. In the discussion of axial distribution factor on page 3.10-17 of the Technical Specification Basis the term $P_j(Z)$ is defined but does not appear in the equations. In Step e, it would appear that "n=6" was meant rather than "n-6".

Mr. George Lear

- 3 -

May 16, 1975

If you or your staff have any questions regarding these comments, please call me (474-6250) or Mr. J. D. Dunkleberger (474-2113).

Sincerely,

A handwritten signature in cursive script, appearing to read "T. K. DeBoer". The signature is written in dark ink and is positioned above the typed name.

T. K. DeBoer, Director
Technological Development Programs