

Indian Point 3
Nuclear Power Plant
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L. M. Hill
Site Executive Officer

October 24, 1995
IPN-95-108

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Notification of Schedule Extension for Commitment:
RESTART 1994 MODIFICATION CLOSEOUT

REFERENCE: 1. NYPA letter IPN-95-036, W. J. Cahill, Jr. to NRC, "Start Up Readiness Evaluation (SURE)," dated March 16, 1995.
2. NRC letter, Richard W. Cooper II to L. Hill, Jr., "NRC Readiness Assessment Team Inspection (RATI) Report," dated May 25, 1995.
3. NYPA letter IPN-94-063, W. A. Josiger to NRC, "Restart and Continuous Improvement Plan (RCIP)," dated May 27, 1994.

Dear Sir:

The New York Power Authority is extending the schedule for a commitment regarding Modification Closeouts. The commitment required resolution and modification package closeout of all Restart 1994 (RS94) outage modifications within 60 days of breaker closure.

The Authority is extending the schedule for this commitment until March 31, 1996, based on the determination that there is no safety significance to the schedule extension.

The commitment for closure of all RS94 modifications was included in:

1. NRC Restart Issue No. NRC-26,
2. our letter regarding the Start Up Readiness Evaluation (SURE), (Reference 1),

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3. section 3.5.3, "Modifications" of the Readiness Assessment Team Inspection (RATI) report, (Reference 2),
4. and was part of action plan R-3.1.1.2, "Resolution of Modification Close-out Process" from the IP3 Restart & Continuous Improvement Plan (Reference 3).

The scope of RS94 modifications consists of approximately 916 modifications, that were planned prior to, or occurred during, the RS94 outage. An additional 103 modifications which were in various stages of completion prior to the RS94 outage, have been added to the original scope for a total of 1,019 modifications. Attachment I is a breakdown of Closed Out, Completed, and Pre-RS94 modifications, with an average of "Closed Out" modifications broken down by quarter for each year, since the beginning of the outage on February 27, 1993.

The "Modification Close Out" requirements documented in NYPA procedure MCM-19 occur essentially in two phases. Completion of the first phase returns the components affected by a modification to service and declares the components operable. All 916 RS94 modifications have successfully concluded this first phase of the modification closeout process and are identified as "Completed".

The second phase of the process is the formal closeout of the modification. It requires closure of all documentation. This second phase of the closeout process does not deal with the operability of modifications. Therefore, our extension only affects document closeout and not the operability of affected components.

The basis for the commitment schedule extension and determination of no safety significance is as follows: increased modifications resulting from emergent and forced outage conditions, additional 103 pre-RS94 Modifications requiring review and closeout added to the modification closeout process, and as previously stated, the operability of plant components is not affected by document closeout .

We intend to complete our closeout of RS94 (+ 103) modifications by the end of the first Quarter of 1996 (March 31, 1996).

This letter revises the due date for an existing commitment, as previously discussed verbally with members of the NRC staff. The Power Authority is making no new commitments in this letter. If you have any questions, please call Mr. K. Peters at (914) 736-8029.

Very truly yours,



L.M. Hill

Site Executive Officer

Indian Point 3 Nuclear Power Plant

Attachments

cc: Mr. Thomas T. Martin
Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

U. S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

Mr. Jefferey F. Harold, Acting Project Manager
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Attachment I

Page 1 of 1

**IP3 DESIGN ENGINEERING
MODIFICATION STATUS AND BREAKDOWN**

SCOPE / STATUS

CLOSEOUT PROGRESS (AVG.)

RS94

627 Closed Out

289 Not Closed Out

916 Total

1993 / 23 - MODs per qtr

1994 / 56 - MODs per qtr

1995 / 98 - MODs per qtr

(as of August 24, 1995)

PRE-RS94

103 Not Closed Out

1,019 Grand Total

Total Modifications Left To Close Out: 392