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New York Power Authority

William J. Cahill, Jr.
Chief Nuclear Officer

April 16, 1996
IPN-96-045

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
License No. DPR-64
Response to NRC Generic Letter 96-01:
"Testing of Safety-Related Logic Circuits"

Reference: 1. U. S. Nuclear Regulatory Commission, Generic Letter 96-01: "Testing of Safety-Related Logic Circuits," January 10, 1996.

Dear Sir:

This letter provides the Authority's response to Generic Letter (GL) 96-01, "Testing of Safety-Related Logic Circuits," (Reference 1) for the Indian Point 3 Nuclear Power Plant. The generic letter requests all holders of an operating license to submit to the Nuclear Regulatory Commission (NRC) a written response, per 10 CFR 50.54(f), within 60 days from the date of the generic letter. This date was extended by the NRC to April 18, 1996.

The NRC issued the generic letter to (1) notify addressees about problems with testing of safety-related logic circuits, (2) request that all addressees implement the actions described in the generic letter, and (3) request that all addressees submit to the NRC a written response to the generic letter regarding implementation of the requested actions.

Attachment I to this letter provides the Indian Point 3 Nuclear Power Plant response to Generic Letter 96-01, indicating the actions to be accomplished in accordance with NRC Requested Actions (1) and (2). The attachment also submits

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the schedule for completing implementation of these actions prior to startup from the next refueling outage commencing one year after the issuance of this generic letter. The next NYPA refueling outage for Indian Point Unit No. 3, is currently planned to commence in spring or summer 1997.

Attachment II of this letter contains the commitments associated with this letter. If you have any questions regarding this matter, please contact Mr. K. Peters of my staff at (914) 736-8029.

Very truly yours,

William J. Cahill, Jr.
Chief Nuclear Officer
Nuclear Generation

STATE OF NEW YORK
COUNTY OF WESTCHESTER
Subscribed and Sworn to before me

this 16th day of April, 1996

Geraldine Strand
Notary Public

GERALDINE STRAND
Notary Public, State of New York
No. 4991272
Qualified in Westchester County
Commission Expires Jan. 27, 1998

cc: See next page
att: as stated

cc: U. S. Nuclear Regulatory Commission
475 Allendale Road
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Resident Inspector's Office
Indian Point 3
U. S. Nuclear Regulatory Commission
P. O. Box 337
Buchanan, NY 10511

Mr. George F. Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U. S. Nuclear Regulatory Commission
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ATTACHMENT I to IPN-96-045

IMPLEMENTATION OF REQUESTED ACTIONS

PERTAINING TO

TESTING OF SAFETY-RELATED LOGIC CIRCUITS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

The Authority's response to the NRC Requested Actions (1) and (2), below, submit Indian Point 3 Nuclear Power Plants planned implementation of the requested actions.

NRC REQUESTED ACTION:

(1) Compare electrical schematic drawings and logic diagrams for the reactor protection system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including the parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the TS requirements. This review should also include relay contacts, control switches, and other relevant electrical components within these systems, utilized in the logic circuits performing a safety function.

NYPA RESPONSE:

NYPA will compare electrical schematic drawings and logic drawings for the reactor protection system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including the parallel logic, interlocks, bypasses and inhibit circuits are adequately covered in the surveillance procedures to fulfill the Technical Specification requirements. This review will include relay contacts, control switches, and other relevant electrical components within these systems, utilized in the logic circuits to perform a safety function.

In support of this effort relevant sections of the Updated Final Safety Analysis Report, Accident Analysis Basis Document and previous drawing-to-procedure reports will be integrated into the review process to ensure accident-mitigating automatic actuation circuits and required tests are included in the surveillance program.

NRC REQUESTED ACTION:

(2) Modify the surveillance procedures as necessary for complete testing to comply with the technical specifications. Additionally, the licensee may request an amendment to the technical specifications if relief from certain testing requirements can be justified.

NYPA RESPONSE:

Where technical specification surveillance testing is determined to be inadequate relative to this generic letter, NYPA will modify the surveillance procedures, issue new procedures, or request an amendment to the Technical Specifications if relief from certain testing requirements is justified, as necessary to comply with the station Technical Specification requirements.

The NYPA schedule for implementation of the requested actions is prior to startup from Indian Point Unit No. 3's next scheduled refuel outage (RO9 currently planned for the spring or summer of 1997).

ATTACHMENT II to IPN-96-045

AUTHORITY COMMITMENTS

RELATED TO

TESTING OF SAFETY-RELATED LOGIC CIRCUITS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

COMMITMENTS ASSOCIATED WITH IPN-96-045

Commitment Number	Commitment	Due Date
IPN-96-045-01	NYPA will compare electrical schematic drawings and logic drawings for the reactor protection system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including the parallel logic, interlocks, bypasses and inhibit circuits are adequately covered in the surveillance procedures to fulfill the Technical Specification requirements.	Prior to startup from the first refueling outage commencing one year after issuance of GL 96-01 which is Refuel Outage 9.

Commitment Number	Commitment	Due Date
IPN-96-045-02	Where technical specification surveillance testing is determined to be inadequate relative to this generic letter, NYPA will modify the surveillance procedures, issue new procedures, or request an amendment to the Technical Specifications, if relief from certain testing requirements is justified, as necessary to comply with the station Technical Specification requirements.	Prior to startup from the first refueling outage commencing one year after issuance of GL 96-01 which is Refuel Outage 9.
IPN-96-045-03	NYPA will submit to the NRC a response letter confirming completion of the requested actions in GL 96-01.	Within 30 days of completion of the actions in GL 96-01.