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NewYorkPower Authority

William J. Cahill, Jr.
Chief Nuclear Officer

December 23, 1996
IPN-96-131

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

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Relief Request in accordance with 10 CFR 50.55a (f) for
One-time Deferral of Inservice Test Program Valve Testing

REFERENCE:
1. NYPA letter (IPN-96-107) to NRC; "Proposed Technical Specification Change Regarding One-time Extension for Surveillance Functional Tests," dated October 1, 1996.
2. NRC letter to W. J. Cahill; "Safety Evaluation of Revision 4 of the Second 10-Year Interval Inservice Testing Program Relief Request," dated September 13, 1994.

Dear Sir:

The New York Power Authority is requesting review and approval of the attached Relief Request VR-50 for the Second Ten Year Interval Inservice Test (IST) Program. This request for relief provides for a one-time deferral of certain valve tests and is being made in conjunction with the Authority's proposed Technical Specification change (Reference 1) for a one-time extension of surveillance functional tests.

The current version of the IST Program (Reference 2) specifies a 2-year frequency for the valve testing requirements covered by this relief request. These tests are generally performed during refueling outages and were last performed during the Indian Point 3 Restart and Continuous Improvement outage. The 30-month time interval (2 years plus 25% grace period) will expire for the affected valve tests prior to the next refueling outage, scheduled for Spring 1997. A one-time deferral of up to four months is being requested so that valve testing can be performed during the next refueling outage. Deferral of valve testing will not be used to extend plant operation beyond May 31, 1997.

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There are no new commitments associated with this letter. The Authority requests your response by January 29, 1997 based on the earliest due date of the valves covered by this relief request. If you have any questions regarding this letter, please contact Mr. K. Peters.

Very truly yours,

William J. Cahill, Jr.
Chief Nuclear Officer

cc: U.S. Nuclear Regulatory Commission
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Resident Inspector's Office
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ATTACHMENT I TO IPN-96-131

INSERVICE TESTING PROGRAM RELIEF REQUEST

FOR ONE-TIME DEFERRAL OF

ASME SECTION XI VALVE TESTING REQUIREMENTS

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

INDIAN POINT 3 INSERVICE TESTING PROGRAM

RELIEF REQUEST NO. VR-50

SYSTEM: Various, refer to attached Table.

VALVES: Refer to attached Table.

CATEGORY: A (Valve NNE-1610 is also Category C)

FUNCTION: Containment isolation valves; refer to Table for additional information.

REQUIREMENT:

IWV-3420 requires that leak rate tests of Category A valves be performed at least once every 2 years (indicated as LT-1 on attached Table). IWV-3300 requires that valves with remote position indicators shall be observed at least once every 2 years to verify that valve operation is accurately indicated (PIT on attached Table).

BASIS FOR RELIEF:

The test requirements addressed by this relief request are specified as a 2-year frequency interval with a 25% allowable grace period. These tests were last performed mid to late 1994 while the reactor was shutdown during the Restart and Continuous Improvement outage. The 30-month time interval for these valves will expire prior to the next refueling outage scheduled for Spring 1997. Testing these valves requires that the plant be in cold shutdown and this testing is generally performed during refueling outages. The requested relief provides for a one-time deferral of the specified valve testing requirements to the next scheduled refueling outage. This one-time deferral will not be used to extend plant operation beyond May 31, 1997.

The "LT-1" valve leak test is the same test performed to satisfy 10 CFR 50 Appendix J Type C testing of containment isolation valves. One-time deferral of leak testing was also the subject of a 10 CFR 50 Appendix J exemption request previously submitted to the NRC by the Authority (IPN-96-123, dated December 5, 1996).

Existing relief requests VR-15 and VR-18 include an alternate frequency of 'refueling outage' for position indication testing. The Technical Evaluation Report (Sections 3.2.2.2 and 3.2.2.3) issued with the Revision 4 IST Program Safety Evaluation (September 13, 1994) states that this is in compliance with Section XI requirements and relief is not required.

ALTERNATIVE TESTING:

LT-1 testing will be in accordance with ASME/ANSI OMa-1988, Part 10 subject to approval of the December 5, 1996 exemption request. Paragraph 4.2.2.2, "Containment Isolation Valves" states that Category A valves, which are containment isolation valves, shall be tested in accordance with 10 CFR 50, Appendix J.

VALVE LIST FOR IST PROGRAM RELIEF REQUEST VR-50

VALVE ID	SYSTEM	FUNCTION	RELIEF REQUESTED LT-1	PIT
PCV-1229, -1230	CAR	SJAE exhaust to containment	X	
SOV-510, -511	SMPL	H_2 analyzer return to containment	X	
WD-AOV-1702, -1705	WD	RCDT drain to waste system	X	
WD-AOV-1723, -1728	WD	Containment sump discharge	X	
NNE-1610	Nitrogen	N_2 supply to containment	X	
CH-AOV-201, -202	CVCS	RCS letdown isolation	X	
CH-AOV-205, -226, -227	CVCS	RCS charging isolation	X	
CH-MOV-222	CVCS	RCP seal water return isolation	X	X
CH-MOV-250A, B, C, & D CH-MOV-441, -442, -443, & -444	CVCS	RCP seal injection isolation	X	X
SP-AOV-956G & H	SMPL	Accumulator sample isolation	X	
SI-MOV-1835A & B	SI	BIT outlet valve	X	
SI-MOV-850A, -850C, & -851A	SI	SI pump discharge isolation	X	
SI-869A	SI	Containment spray pump discharge isolation	X	
SI-MOV-885A & B	SI	Containment sump RHR suction isolation	X	X
SI-MOV-743 & -1870	RHR	RHR pump mini flow isolation		X
AC-MOV-769, -784, -786, & -789	CCW	Component cooling water supply and return isolation valves for RCP seal & bearing coolers and vessel support blocks.	X	X
AC-AOV-791, -793, -796, & -798	CCW	Component cooling water supply and return isolation valves for excess letdown HX	X	
AC-FCV-625	CCW	Component cooling water return isolation for RCP seal coolers	X	X
SI-MOV-888A & B	SI	Low head to high head SI recirculation stop valve	X	

CAR - Condenser Air Removal SMPL - Sampling System WD - Waste Disposal
CVCS - Chemical and Volume Control System SI - Safety Injection RHR - Residual Heat Removal
CCW - Component Cooling Water