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New York Power Authority

March 3, 1994
IPN-94-025

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

Attention: Document Control Desk

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Response to Request for Additional Information on
Proposed Changes to Technical Specifications
Regarding Extending Chemical and Volume Control
System Testing to Accommodate a 24 Month Operating Cycle

References:
1. Letter from Ralph E. Beedle to the NRC entitled, "Proposed Changes to Technical Specifications Regarding Extending Chemical and Volume Control System Testing to Accommodate a 24 Month Operating Cycle," dated May 18, 1993.

2. Letter from Nicola F. Conicella to Ralph E. Beedle entitled, "Request for Additional Information Concerning the Proposed Technical Specification Change Extending Chemical and Volume Control System Testing to Accommodate a 24-Month Operating Cycle for Indian Point Nuclear Generating Unit No. 3 (TAC No. M86454)," dated January 11, 1994.

Dear Sir:

On May 18, 1993, the Authority submitted a proposed change (Reference 1) to the Indian Point 3 Technical Specifications to accommodate a 24 month operating cycle. In Reference 2, the NRC requested additional information in support of the proposed change to the Technical Specifications. The requested information is provided as Attachment I.

A001

This letter contains no new commitments. If you have any questions, please contact Mr. P. Kokolakis.

Very truly yours,

William A. Josiger
Acting Executive Vice President
Nuclear Generation

cc: U.S. Nuclear Regulatory Commission
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ATTACHMENT I TO IPN-94-025

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

RELATED TO

EXTENDING CHEMICAL AND VOLUME CONTROL SYSTEM TESTING TO ACCOMMODATE A 24 MONTH OPERATING CYCLE

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

On May 18, 1994, the Authority submitted a proposed change (Reference 1) to the Technical Specifications regarding extending certain Chemical and Volume Control System tests to accommodate a 24 month operating cycle. Recent evaluations have shown that four valves (AC-701A, AC-701B, AC-756A, and AC-756B) should be tested as required by Technical Specification Table 4.1-3 item 12. The Authority submitted Licensee Event Report (LER) 93-049-00 (Reference 3) on December 3, 1993, describing the event.

The information below responds to the NRC request for additional information (Reference 2) and clarifies testing of the city water cooling system. The NRC request is restated, followed by the Authority's response:

(1) Please provide clarification of the information contained in your May 18, 1993, submittal as related to the city water connections to charging pumps and boric acid piping.

In the Safety Evaluation of Reference 1, drain valve MW-684 was described as separating the Auxiliary Cooling System from the City Water System. This valve is actually located on a drain line between the city water system and the auxiliary cooling system. Valve AC-701A is the first valve after the city water/auxiliary cooling system interface. (Refer to the figure attached to LER 93-049-00 for details.)

(2) Please provide a basis for conducting the refueling surveillance test for valves AC-701A, AC-701B, AC-756A, and AC-756B on a 30-month interval (24 months plus 25 percent extension).

Given below is the basis for testing these valves on a 24 month operating cycle interval as part of the emergency city water to charging and boric acid transfer pumps surveillance test (Technical Specification Table 4.1-3 item 12):

- *Valves AC-701A and AC-701B can be tested at power operation. They will be tested quarterly in accordance with ASME Section XI under the Indian Point 3 Inservice Testing Program.*
- *Valves AC-756A and AC-756B will be tested in accordance with ASME Section XI at a cold shutdown interval, since the shutting of these valves will isolate cooling to the charging pump oil coolers; therefore, valves, AC-756A and AC-756B, represent a testing burden during power operation.*
- *Auxiliary coolant water contains a corrosion inhibitor that should minimize degradation of these valves or piping for the additional testing interval.*
- *Although the valves were not previously tested as part of the surveillance program, a recent stroke test of these valves demonstrated operability.*

Once every refueling outage, a surveillance test will be performed that consists of cycling valves AC-701A, AC-701B, AC-756A, and AC-756B, and flow testing the city water piping. The test does not include flow testing the city water through

valves AC-701A and AC-701B and into the auxiliary coolant system to the charging pump oil coolers. The auxiliary cooling system water runs continuously to cool the charging pump oil coolers while the charging pumps are in operation. Therefore testing flow from 701A and 701B to the charging pumps oil coolers is not necessary.

In addition, the auxiliary cooling system water is demineralized water that contains corrosion inhibitors, and introduction of city water into this system would be undesirable to the auxiliary cooling system during non-emergency conditions. Piping from the flange through valves AC-701A and AC-701B is part of the auxiliary cooling system and is not expected to contain deposits (from piping corrosion) in sufficient quantity to cause flow restriction or valve degradation. Therefore flow testing through valves AC-701A and AC-701B is also not necessary.

As a result, the performance test will show availability of the city water system to the charging pump oil coolers.

References:

1. Letter from Ralph E. Beedle to the NRC entitled, "Proposed Changes to Technical Specifications Regarding Extending Chemical and Volume Control System Testing to Accommodate a 24 Month Operating Cycle," dated May 18, 1993.

2. Letter from Nicola F. Conicella to Ralph E. Beedle entitled, "Request for Additional Information Concerning the Proposed Technical Specification Change Extending Chemical and Volume Control System Testing to Accommodate a 24-Month Operating Cycle for Indian Point Nuclear Generating Unit No. 3 (TAC No. M86454)," dated January 11, 1994.

3. Letter from John H. Garrity to the NRC entitled, "Indian Point 3 Nuclear Power Plant, Docket No. 50-286, Licensee Event Report 93-049-00, 'Violation of Technical Specifications Due to a Failure to Adequately Test the Valves Connecting the Emergency City Water Supply to the Charging Water Pumps' Coolers,'" dated December 3, 1993.