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William J. Cahill, Jr. Chief Nuclear Officer

April 12, 1995 IPN-95-046

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

Subject:

**Indian Point 3 Nuclear Power Plant** 

**Docket No. 50-286** 

Supplement to the Proposed Technical Specification
Changes Regarding Extending Indicating Instrument
Calibrations to Accommodate a 24 Month Operating Cycle

References:

- 1. NYPA letter, W. J. Cahill, Jr. to NRC, "Proposed Change to Technical Specifications Regarding Extending Indicating Instrument Calibrations to Accommodate a 24 Month Operating Cycle," (IPN-95-029), dated March 3, 1995.
- 2. Example 2, Federal Register, Volume 48, Number 67, dated April 6, 1993, page 14870.

Dear Sir:

This letter supplements the no significant safety hazards evaluation for the Technical Specification changes discussed in Reference 1. Presented below is the evaluation for the core exit thermocouple test.

There are 65 incore thermocouples to monitor temperature above the exit flow end of the fuel assemblies. Of the 65 thermocouples, 20 have been qualified to meet the requirements of Regulatory Guide 1.97. Testing of this system is currently conducted but is not a Technical Specification requirement. Reference 1 revised item 37 of Technical Specification Table 4.1-1 to add a core exit thermocouple test every 18 months. The performance of this test ensures system operability and does not change the way the plant operates or involve hardware modifications. Therefore, it does not increase the probability or

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consequence of a previously analyzed accident, create the possibility of a new or different kind of accident, or involve a reduction in a margin of safety. Further, as defined in Reference 2, a change that represents an additional Technical Specification constraint does not represent a significant safety hazard. Therefore, the addition of the core exit thermocouple test meets the no significant safety hazards criteria in 10 CFR 50.92.

This letter contains no new commitments. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

William J. Cahill, Jr. Chief Nuclear Officer

cc: U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

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