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William J. Cahill, Jr.  
Chief Nuclear Officer

November 20, 1995  
IPN-95-120

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

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
**Clarification of Proposed Technical Specifications Regarding the  
Surveillance Extension of Indicating Instrument Calibrations**

- 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. NYPA letter, W. J. Cahill Jr. to NRC, "Supplement to the Proposed Technical Specification Changes Regarding Extending Indicating Instrument Calibrations to Accommodate a 24 Month Operating Cycle" (IPN-95-046), dated April 12, 1995.

Dear Sir:

This letter summarizes the telecon held on October 4, 1995 between the NRC and the Authority to discuss the Indian Point 3 proposed Technical Specification changes submitted by Reference 1, and supplemented by Reference 2. The following issues were clarified during this telecon.

An extension of the calibration intervals for the containment building water level (wide range) indicators and the containment sump and recirculation sump level indicators (narrow range) was proposed in Reference 1. The wide range indicators are relied upon in the Emergency Operating Procedures (EOPs) for accident mitigation. An analysis was completed which concluded that extension of the calibration interval for the wide range indicators was acceptable. The narrow range containment level indicators are not relied upon in the EOPs. The calibration extension for the narrow range is acceptable, as postulated increases in drift will have no effect on accident mitigation or safe plant shutdown for design basis accidents. In addition, in order to keep the radiation dose to plant personnel "as low as reasonably achievable," calibration of these devices should only be performed when the reactor is shutdown.

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Reference 1 also requested an extension of the calibration interval for the auxiliary feedwater (AFW) flow rate channels. The Authority is withdrawing this request. Technical Specification Table 4.1-1 (Sheet 4 of 6), submitted by Reference 1, should be disregarded. The Westinghouse Owner's Group (WOG) is investigating an issue concerning the determination of the total AFW flow to the steam generators during emergency conditions. Therefore, calibrations of the AFW channels will be performed within the bounds of the current Technical Specifications at a frequency determined by evaluations performed by the Authority, and guidance provided by the WOG.

Finally, References 1 and 2 sought to add a functional test requirement for the core exit thermocouples and listed the proposed test's four major operability criteria. The second operability criterion referred to the cross checking of the "as found" thermocouple indications on the reactor vessel level indicating system (RVLIS) local display with the corresponding qualified safety parameter display system (QSPDS) readings. The criterion stated that the difference between these two readings must not exceed 20°F. The Authority has an ACTS item (#5965) which, in part, will evaluate the 20°F allowable differential against more stringent requirements listed in other surveillance procedures. This action will be completed prior to the completion of the next thermocouple functional test. The RTDs referred to in the third and fourth sections of the operability criteria are not related to the reactor coolant system RTDs, but provide temperature compensation for the thermocouple reference junction box.

Attachment 1 contains the commitment made by the Authority in this submittal. If you have any questions, please contact Ms. C. D. Faison at (914) 681-6306.

Very truly yours,



William J. Cahill, Jr.  
Chief Nuclear Officer

Attachments: as stated  
cc: See next page

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**ATTACHMENT I**  
**COMMITMENT LIST FOR IPN-95-120**

New York Power Authority  
Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
DPR-64

**COMMITMENT ASSOCIATED WITH IPN-95-DRAFT**

Commitment No.	Commitment	Due Date
IPN-95-120-01	In accordance with ACTS #5965, evaluate the thermocouple functional test operability criterion which states that the difference between the "as-found" thermocouple indications on the RVLIS local display and the corresponding QSPDS reading does not exceed 20°F.	2/1/96