ATTACHMENT I TO IPN-96-025

PROPOSED TECHNICAL SPECIFICATION CHANGES

ASSOCIATED WITH

ACCUMULATOR LEVEL AND PRESSURE INSTRUMENTATION

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

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Channel Description		<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	Remarks
	e. Main Steam Lines Process Radiation Monitors (R-62A, R-62B, R-62C, and R-62D)	D	24M	Q	•
	f. Gross Failed Fuel Detectors (R-63A and R-63B)	. D	24M	Q	
16.	Containment Water Level Monitoring System:		•		
	a. Containment Sump	N.A.	24M	N.A.	Narrow Range, Analog
	b. Recirculation Sump	N.A.	24M	N.A.	Narrow Range, Analog
	c. Containment Water Level	N.A.	24M	N.A.	Wide Range
17.	Accumulator Level and Pressure	s	18M	N.A.	
18.	Steam Line Pressure	S	24M	Q	
19.	Turbine First Stage Pressure	S	24M	Q	
20a, Reactor Trip Relay Logic		ΝΑ	ΝΔ	тм	
20b. ESF Actuation Relay Logic		N.A.	N.A.	TM	
21.	Turbine Trip Low Auto Stop Oil Pressure	N.A.	24M	N.A.	
22.	DELETED	DELETED	DELETED	DELETED	
23.	Temperature Sensor in Auxiliary Boiler Feedwater Pump Building	N.A.	N.A.	18M	
24.	Temperature Sensors in Primary Auxiliary Building				
	a. Piping Penetration Area	N.A.	N.A.	24M	
	b. Mini-Containment Area	N.A.	N.A.	24M	
	c. Steam Generator Blowdown Heat Exchanger Room	N.A.	N.A.	24M	

TABLE 4.1-1 (Sheet 3 of 6)

Amendment No. 38, 63, 74, 93, 100, 107, 128, 127, 133, 137, 139, 164,

<u>TABLE 4.1-1</u> (Sheet 6 of 6)

Table Notation

- * By means of the movable incore detector system
- ** Quarterly when reactor power is below the setpoint and prior to each startup if not done previous month.

These requirements are applicable when specification 3.3.F.5 is in effect only.

- S Each Shift
- W Weekly
- P Prior to each startup if not done previous week
- M Monthly
- NA Not Applicable
- Q Quarterly
- D Daily
- 18M At least once per 18 months
- TM At least every two months on a staggered test basis (i.e., one train per month)
- 24M At least once per 24 months
- 6M At least once per 6 months

Amendment No. 137, 154,





ATTACHMENT II TO IPN-96-025

SAFETY EVALUATION OF

PROPOSED TECHNICAL SPECIFICATION CHANGES

ASSOCIATED WITH

ACCUMULATOR LEVEL AND PRESSURE INSTRUMENTATION

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



Safety Evaluation of Proposed Changes to Technical Specifications Associated with Accumulator Level and Pressure Instrumentation

Section I - Description of Changes

The proposed amendment to Table 4.1-1, "Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels," will eliminate a requirement to interconnect two or more accumulators for the purpose of cross checking instrumentation in the event that one of the two pressure or level instrument channels on an accumulator is declared inoperable. The specific changes are as follows:

- 1. Table 4.1-1, sheet 3 of 6, line item 17, second column: Change "S***" to read "S".
- 2. Table 4.1-1, sheet 6 of 6: Delete " *** If either an accumulator level or pressure instrument channel is declared inoperable, the remaining level or pressure channel must be verified operable by interconnecting and equalizing (pressure and/or level wise) a minimum of two accumulators and crosschecking the instrumentation."

Section II - Evaluation of Changes

Accident analyses for the Large Break Loss of Coolant Accident (LBLOCA) assume that three accumulators contribute to core reflooding and fuel cooling. Based on a recent discovery, interconnecting two or more accumulators for the purpose of cross checking instrumentation is an inappropriate action. This configuration could affect the availability of three or more accumulators to perform their intended safety function during the postulated design basis LBLOCA. The appropriate methods of assuring instrument channel operability use periodic instrument channel checks and instrument channel calibrations as defined in Specification 1.9.

An "Instrument Channel Check" is a qualitative determination of acceptable operability by observation of channel behavior during operation. The requirement to perform an instrument channel check for accumulator pressure and level once per shift will not be eliminated by the proposed amendment. The channel check is accomplished by plant operators observing and logging instrument readings. Even with one pressure and / or level instrument channel out of service for an accumulator, this qualitative determination of acceptable operability for the remaining channel provides the basis for determining the operability of the affected accumulator, as required by Specification 3.3.A.3. The definition of "Instrument Channel Check" also provides for a comparison to other independent channels measuring the same variable, *where possible*. However, comparison to other channels in this case is not possible because interconnecting accumulators at power operation conditions is not consistent with the plant safety analyses.

The proposed amendment is consistent with the Standard Technical Specifications (STS) which require the accumulators to be operable based on water volume, boron concentration and cover gas pressure. The STS does not specify instrumentation requirements to demonstrate that operability.



Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously analyzed?

Response:

The design basis accident for which the accumulators were designed is the double ended guillotine break of a cold leg. Interconnecting or not interconnecting accumulators does not have any affect on the probability of occurrence of this event. By eliminating the requirement to interconnect accumulators, the proposed amendment assures that a minimum of three accumulators are available, as assumed in the safety analyses, to mitigate the consequences of a LBLOCA. Therefore the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously analyzed.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The proposed amendment does not involve any physical changes to plant equipment or setpoints and does not create the possibility of a new or different kind of accident. Eliminating the requirement to interconnect accumulators ensures that the plant configuration is maintained consistent with that assumed in the safety analysis and no new failure modes are created.

(3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

There is no margin of safety specified in the Technical Specifications for these instrument channels. There are no setpoints or allowable values associated with these instrument channels which affect Safety Limits or Limiting Safety System Settings. The proposed amendment ensures that the safety analysis assumption regarding the accumulators remains valid and the resulting peak fuel clad temperature meets specified acceptance criteria. The proposed amendment does not involve a significant reduction in a margin of safety.



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Section IV - Impact of Changes

The proposed changes will not adversely affect the following:

ALARA Program Security and Fire Protection Programs Emergency Plan FSAR or SER Conclusions Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the bases for any technical specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

- 1. Indian Point 3 Updated FSAR, Chapter 14.3, "Loss-of-Coolant Accidents."
- 2. NUREG 1431, "Standard Technical Specifications Westinghouse Plants," Revision 1, dated April 1995.