ATTACHMENT I TO IPN-96-070

PROPOSED TECHNICAL SPECIFICATION CHANGES

REGARDING SURVEILLANCE INTERVAL FOR INSTRUMENT CHANNELS

TO ACCOMMODATE A 24-MONTH OPERATING CYCLE

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

TABLE 4.1-1 (Sheet 2 of 6)

Channel Description	Check	Calibrate	Test	Remarks
8. 6.9 KV Voltage	N.A.	18M	Q	Reactor protection circuits only
6.9 KV Frequency	N.A.	24M	Q	Reactor protection circuits only
9. Analog Rod Position	S	24M	M	
10. Steam Generator Level	S	24M	Q	
11. Residual Heat Removal Pump Flow	N.A.	24M	N.A.	
12. Boric Acid Tank Level	S	24M	N.A.	Bubbler tube rodded during calibration
13. Refueling Water Storage Tank Level				
a. Transmitter	W	18M	N.A.	Low level alarm
b. Indicating Switch	W	6M	N.A.	Low level alarm
14a. Containment Pressure - narrow range	S	24M	Q	High and High-High
14b. Containment Pressure - wide range	M	18M	N.A.	
15. Process and Area Radiation Monitoring:				
a. Fuel Storage Building Area Radiation Monitor (R-5)	D	24M	Q	
b. Vapor Containment Process Radiation Monitors (R-11 and R-12)	D	24M	Q	
c. Vapor Containment High Radiation Monitors (R-25 and R-26)	D	24M	Q	
d. Wide Range Plant Vent Gas Process Radiation Monitor (R-27)	D	24M	Q	

TABLE 4.1-1 (Sheet 4 of 6)

Channel Description	Check	Calibrate	Test	Remarks
25. Level Sensors in Turbine Building	N.A.	N.A.	24M	
26. Volume Control Tank Level	N.A.	18M	N.A.	
27. Boric Acid Makeup Flow Channel	N.A.	24M	N.A.	
28. Auxiliary Feedwater:				
a. Steam Generator Level	S	24M	Q	Low-Low
b. Undervoltage	N.A.	24M	24M	
c. Main Feedwater Pump Trip	N.A.	N.A.	24M	
29. Reactor Coolant System Subcooling Margin Monitor	D	24M	N.A.	
30. PORV Position Indicator	N.A.	N.A.	24M	Limit Switch
31. PORV Position Indicator	D	24M	24M	Acoustic Monitor
32. Safety Valve Position Indicator	D	24M	24M	Acoustic Monitor
33. Auxiliary Feedwater Flow Rate	N.A.	18M	N.A.	
34. Plant Effluent Radioiodine/ Particulate Sampling	N.A.	N.A.	18M	Sample line common with monitor R-13
35. Loss of Power				
a. 480v Bus Undervoltage Relay	N.A.	24M	M	
b. 480v Bus Degraded Voltage Relay	N.A.	18M	M	
c. 480v Safeguards Bus Undervoltage Alarm	N.A.	24M	M	
36. Containment Hydrogen Monitors	D	Q	M	

Amendment No. 38, 44, 54, 65, 67, 74, 93, 125, 136, 137, 142, 144, 150,

TABLE 4.1-1 (Sheet 5 of 6)

Channel Description	Check	Calibrate	Test	Remarks
37. Core Exit Thermocouples	D	N.A.	18M	
38. Overpressure Protection System (OPS)	D	18M (1)	24M	1) Calibration frequency for OPS sensors (RCS pressure and temperature) is 24 months.
39. Reactor Trip Breakers	N.A.	N.A.	TM(1)	1) Independent operation of under-voltage and shunt trip attachments
			24M(2)	2) Independent operation of under-voltage and shunt trip from Control Room manual push-button
40. Reactor Trip Bypass Breakers	N.A.	N.A.	(1)	1) Manual shunt trip prior to each use
			24M(2)	2) Independent operation of under-voltage and shunt trip from Control Room manual push-button
			24M(3)	3) Automatic undervoltage trip
41. Reactor Vessel Level Indication System (RVLIS)	D	24M	N.A.	
42. Ambient Temperature Sensors Within the Containment Building	D	24M	N.A.	
43. River Water Temperature # (installed)	S	18M	N.A.	
44. River Water Temperature # (portable)	S (1)	Q (2)	N.A.	1) Check against installed instrumentation or another portable device. 2) Calibrate within 30 days prior to use and quarterly thereafter.
45. Steam Line Flow	S	24M	Q	Engineered Safety Features circuits only

Amendment No. 38, 54, 65, 74, 78, 93, 98, 107, 125, 126, 137, 140, 142, 164,

ATTACHMENT II TO IPN-96-070

SAFETY EVALUATION OF

PROPOSED TECHNICAL SPECIFICATION CHANGES

REGARDING SURVEILLANCE INTERVALS FOR INSTRUMENT CHANNELS

TO ACCOMMODATE A 24-MONTH OPERATING CYCLE

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

Section I - Description of Changes

This application for amendment to the Indian Point 3 Technical Specifications proposes to change the surveillance frequency requirements in Table 4.1-1, "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels" to accommodate a 24-month operating cycle. The specific changes are the calibration frequencies for the following instrument channels:

Line item 15c; Vapor Containment High Radiation Monitors
Line item 29; Reactor Coolant System Subcooling Margin Monitor (SMM),
Line item 38; Overpressure Protection System (OPS), and
Line item 41; Reactor Vessel Level Indication System (RVLIS).

The existing calibration frequency requirement for these instrument channels will be increased from 18 months (22.5 months including the 25% extension allowance) to 24 months (30 months including the 25% extension allowance). This application also includes a proposed change, from 18 months to 24 months, to the functional test frequency for that portion of the OPS that requires the plant to be shutdown to perform the test. A portion of the OPS surveillance calibration which affects analog components located outside containment will continue to be performed at a more frequent interval pending completion of additional analyses to support a future proposed Technical Specification amendment.

Section II - Evaluation of Changes

Starting with cycle 9 (that began in August 1992), Indian Point 3 began operating on 24-month cycles, instead of the previous 18-month cycles. To avoid either a separate surveillance outage or an extended mid-cycle outage, changes are required to system surveillance intervals. Evaluation of the proposed changes included use of guidance provided in NRC Generic Letter 91-04 (Reference 1). Factors considered in the proposed extension of surveillance frequency requirements included past equipment performance, results of loop accuracy and setpoint calculations, and effects on IP3 Emergency Operating Procedures (EOPs), accident analyses, and safe plant shutdown.

Calibration Extension Program

The NRC staff has determined that licensees should address a number of issues in providing an acceptable basis for extending the calibration interval for instruments that are used to perform safety functions. NRC Generic Letter 91-04, Enclosure 2 specifies the licensee actions to be taken to address these issues. These actions include:

1. confirming that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records has not, except on rare occasions, exceeded acceptable limits for a calibration interval;

2. confirming that the values of drift for each instrument type (make, model and range)

and application have been determined with a high probability and a high degree of confidence; and providing a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data;

3. confirming that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type and application that performs a safety function; and providing a list of the channels by technical specification section that identifies these instrument applications;

4. confirming that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis; providing proposed technical specification changes to update trip setpoints to accommodate drift errors, if necessary, and providing a summary of the updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded;

5. confirming that the projected instrument errors caused by drift are acceptable for control of plant parameters to effect a safe shutdown with the associated instrumentation;

6. confirming that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional tests, and channel calibrations; and

7. providing a summary description of the program for monitoring and assessing the effects on increased calibration surveillance intervals on instrument drift and its effect on safety.

NYPA has reviewed past performance, analyzed instrument drift, revised loop accuracy/setpoint calculations based on updated drift and uncertainty values, and is adding the affected instruments to the drift monitoring program. The following sections describe how this was accomplished using guidance provided by the generic letter.

Instrument Drift Analysis

Generic Letter 91-04 requires that instrument drift be reviewed for consistency with setpoint uncertainty calculations under the extended operating cycle. The Westinghouse Drift Evaluation Methodology, as described in Reference 2, was used to assess past instrument performance and to predict drift levels associated with a 30-month interval for pressure and level transmitters associated with the SMM, OPS, and RVLIS. The Westinghouse graded approach was also applied to the drift evaluation, whereby the probability and confidence level of the drift value is varied according to the safety significance of the function. The evaluation for the SMM and RVLIS transmitters was performed based on 75% probability and 75% confidence because these functions support Emergency Operating Procedures and do not

provide RPS/ESFAS automatic actuation or critical control functions. The evaluation for the OPS transmitters was performed based on 95% probability and 95% confidence because of the OPS function to protect the Reactor Coolant System against Low Temperature Overpressurization (LTOP) transients. A qualitative assessment approach was used to evaluate past performance of the radiation detectors used for monitoring containment high radiation. The results of the instrument drift analysis, based on past performance of the affected instruments, to support the proposed 24 month (30 months including the 25% extension allowance) surveillance interval can be summarized as follows:

Containment High Radiation Monitors (RM-25 and -26)

These are Reuter Stokes model RS-C3-1006-201 gamma sensitive ion chamber type radiation detectors which are designed to measure gaseous and vapor fission products in the containment atmosphere. Test results from five completed calibration surveillances covering the time period from 1989 to 1994 were reviewed to evaluate the proposed increase in surveillance frequency. The evaluation concluded that there were no discrepancies or channel errors that were the result of time dependent failures.

RCS Wide Range Pressure transmitters (PT-402 and -403) used for SMM

These are Foxboro model N-E11GH transmitters located inside containment. A statistical evaluation of past as-found / as-left data using the Westinghouse methodology resulted in a calculated drift of $\pm$ 0.75% span, random drift with no time dependency.

RCS Pressure transmitters (PT-413, -433, and -443) used for OPS

These are Foxboro model N-E11GM transmitters located inside containment. The statistical evaluation resulted in a calculated drift of $\pm$ 1.2% span, random drift, with +0.2 bias. Past performance data indicated no time dependency.

RCS Pressure and Level transmitters used for RVLIS

The Reactor Vessel differential pressure-type level transmitters (LT-1311, -1312, -1321, and -1322) are Barton model 752 and are located outside containment. The statistical evaluation resulted in a calculated drift of $\pm$ 1.1% span, random drift in the 'full range' mode, and $\pm$ 0.9% span, random drift with a $\pm$ 1.3% limit of error (treated as a bias to account for time dependency) in 'dynamic range' mode. Past performance data indicated time dependency in the dynamic range but not in the full range.

The RCS Pressure transmitters (PT-410 and -411) are Rosemount model 1153GD9

and are located outside containment. The statistical evaluation resulted in a calculated drift of ± 0.5 % span, random drift with no time dependency.

The review of as-found and as-left data for the above instrumentation concluded that there were very few occasions where transmitter failure was identified based on the as-found condition. The proposed surveillance interval extension is not expected to increase the incidence of transmitter inoperability.

Loop Accuracy / Setpoint Calculations

A loop accuracy calculation (Reference 3) performed for the containment high radiation channels, using conservative hardware error values, verified that these instrument channels continue to meet overall accuracy requirements with the proposed new surveillance interval. Accuracy requirements for this instrument channel are based on Regulatory Guide 1.97.

The loop accuracy / setpoint calculation (Reference 4) for the OPS was updated using the 30-month sensor drift values for the three RCS pressure transmitters. Sensor drift for the three cold leg RTDs was based on industry experience. Drift values for analog rack components were not updated since this portion of instrument loop surveillance will continue to be performed at a more frequent interval pending completion of other analyses.

Performance of SMM and RVLIS for the proposed new surveillance interval were also evaluated (References 5 and 6, respectively) using the 30-month instrument drift allowance results described in the previous section for the affected transmitters. Drift allowances for other sensors and process electronics were based on equipment design information, extrapolated vendor specifications, and Westinghouse / industry experience.

Drift Monitoring Program

In accordance with Generic Letter 91-04, a program to monitor future calibration data was established (Reference 7) to assess the effect a longer calibration interval has on instrument drift. The intent of the program is to confirm that future drift values are within the projected limits calculated in the instrument drift analyses. The drift monitoring program was described in a prior submittal to extend the surveillance intervals (Reference 8) and at a meeting with NRC staff on February 23, 1993 to discuss extension of Reactor Protection System surveillance intervals required for a 24-month refueling cycle. Affected components for the containment high radiation monitor, SMM, OPS, and RVLIS instrumentation channels will be included in the drift monitoring program by the next refueling outage.

Specific Technical Specification Changes

1. Calibration of the Containment High Radiation Monitors

   The containment high radiation channels, R-25 and R-26, are redundant radiation monitors which meet the requirements of Regulatory Guide 1.97 and are designed to

provide information to plant operators during post accident conditions. The monitors are intended to provide information to indicate the potential for or actual breach of a fission product barrier and are used for assessing the magnitude of releases of radioactive material from the reactor coolant system under hypothetical accident conditions. An alarm setting of 3 R/hr is used to alert the operator to the possibility of off-normal conditions in containment and a value of 1×10^5 R/hr is specified in the EOPs to reflect post-accident harsh environment conditions in containment. There are no control or equipment protective functions associated with these instrument channels.

Each instrument channel consists of a high range detector installed in containment above the crane wall at the 95-foot elevation. The detector is a gamma-sensitive ion chamber with a dose rate range of 1 R/hr to 1×10^8 R/hr. The detector output signals are processed by local microprocessors which convert the detector signal to digital and analog data for display. Control Room indication and alarm functions are provided through the Radiation Monitoring Control Cabinet, as well as through an isolated interface with the QSPDS. The system has the ability to monitor channel outputs continuously on trend recorders.

IP3 Technical Specifications require that R-25 and R-26 be calibrated on a refueling interval. Technical Specification Table 3.5-5, item 23 requires that at least one channel be operable with the plant above cold shutdown. The required action if both channels are inoperable is to initiate alternate monitoring capability within 72 hours and restore a channel to operable status within seven days. If a monitor is not restored within seven days, a report must be submitted to the NRC.

These containment high radiation monitoring channels do not perform functions supporting the safety analysis limits and are not credited in the safety analyses. Additionally, the channels do not perform effluent radiation monitoring and are not used in support of the General Design Criteria 19 exposure limits.

Gross failure of these channels, either upscale or downscale, can be detected by alarm, channel check, or trend recorder. Channel checks of containment high radiation monitoring indication are required each shift by the Technical Specifications.

Based on the information provided above it is concluded that the calibration surveillance interval for the Containment High Radiation monitors can be safely extended to support a 24-month operating cycle.

2. Calibration of the Reactor Coolant System Subcooling Margin Monitor

The RCS Subcooling Margin Monitor (SMM) was installed as part of the Inadequate Core Cooling instrumentation in response to NUREG-0737. The system uses core exit thermocouples and wide range RCS pressure transmitters to provide an indication of the margin to saturation for the RCS coolant. Core exit temperature and the subcooling parameter are used in the IP3 EOPs to determine if core cooling is being

maintained. Past performance of the SMM was evaluated for comparison to accuracy requirements previously established by Westinghouse, based on the use of this instrumentation to support the Westinghouse Owners Group Emergency Response Guidelines (WOG ERGs). Calculations were updated, as previously described, using 30-month drift allowances to support the proposed extension of the surveillance calibration interval. The updated calculations also used uncertainties associated with harsh environmental factors related to the pressure transmitter locations in containment. The updated uncertainty calculations demonstrated that the subcooling margin and core exit temperature uncertainties are acceptable. Revisions to the EOPs will be made to account for the new uncertainty values established by the updated calculations.

The proposed increase in the surveillance interval for the SMM is acceptable because the design function of this instrument channel to support post-accident diagnosis of core cooling as reflected in the IP3 EOPs is maintained. Revisions to the EOPs will be made to reflect the results of the updated calculation.

3. Calibration and Functional Test of the Overpressure Protection System

The (OPS) is designed to protect the Reactor Coolant System (RCS) from inadvertent Low Temperature Overpressurization (LTOP) by sending a signal to the Power Operated Relief Valves (PORV) if the RCS pressure setpoint is reached. Technical Specification 3.1.A.8.a requires the OPS to be 'armed' and operable when RCS temperature is below 332 ^{0}F and the RCS is not vented. The OPS is a three-channel analog curve tracking circuit with inputs from three RCS pressure transmitters and three RCS cold leg temperature RTDs. The temperature signals provide the 'arming' function when RCS temperature is below the specified value. The temperature inputs are also used in three respective function generators which output allowable pressure values as a function of temperature. The difference between allowable pressure and actual RCS pressure is calculated and when two out of three differences are smaller than a setpoint value, an actuation signal is generated for each of the two PORVs.

The loop accuracy / setpoint calculation for the OPS was updated using 30-month sensor drift values for the three RCS pressure transmitters, as previously described. Sensor drift for the three cold leg RTDs were based on industry experience. Drift values for analog rack components were not updated since this portion of instrument loop surveillance will continue to be performed at a more frequent interval. The updated loop accuracy calculation concluded that sufficient margin exists between the limiting pressure curve in the Technical Specifications (Technical Specification Figure 3.1.A-3, "RCS Pressure Limits for Low Temperature Operation") and the existing field trip settings with the extended surveillance interval for the RCS pressure transmitters. No change is required to the Technical Specification curve, which is based on 10 CFR 50 Appendix G ferritic steel stress limits associated with fracture toughness requirements.

The functional test of the OPS circuitry is performed with the plant shutdown so that there is no possibility of a plant transient resulting from the inadvertent opening of the PORVs during the conduct of this test. The OPS circuitry has no function during plant operation above the specified low temperature (332 ^{0}F) value. A review of past performance shows that the OPS circuitry functioned as designed when tested. Extending the surveillance frequency for this functional test from 18 to 24 months will allow the test to be performed at intervals consistent with scheduled refueling outages.

Based on the information provided above it is concluded that the surveillance calibration interval for the OPS transmitters and the functional test for the OPS circuitry can be safely extended to support a 24-month fuel cycle.

4. Calibration of the Reactor Vessel Level Indication System

The Reactor Vessel Level Indication System (RVLIS) was installed as part of the Inadequate Core Cooling instrumentation in response to NUREG-0737. The system uses differential pressure measurements to provide indication of reactor vessel water inventory under two conditions; full range and dynamic range. The full range gives level indication from the bottom of the reactor vessel to the top of the reactor head during natural circulation conditions (i.e., with reactor coolant pumps off). The dynamic range is used to measure the relative void content of the circulating coolant when reactor coolant pumps are on. The RVLIS output is available to plant operators on the Qualified Safety Parameter Display System (QSPDS). This information is used in the IP3 EOPs to assist in the detection of the onset of inadequate core cooling conditions, to provide an indication of RCS inventory for terminating safety injection when pressurizer level can not be used, and to determine if a void exists in the reactor vessel head.

Past RVLIS transmitter performance was evaluated to update the loop uncertainty calculations for comparison to accuracy requirements previously established by Westinghouse, based on the use of this instrumentation to support the WOG ERGs. The updated calculations used 30-month drift allowances for the differential pressure type level transmitters and the wide range RCS pressure transmitters, as previously discussed. The updated RVLIS uncertainty calculations demonstrated that system uncertainties for the proposed new calibration interval meet the previously established accuracy requirements. Therefore the proposed extension of the RVLIS calibration surveillance interval can safely be made to support a 24-month operating cycle.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the proposed changes to the technical specifications are 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 proposed changes do not involve a significant increase in the probability or consequence of any accident previously evaluated. The proposed changes are being made to extend surveillance frequencies from 18 months to 24 months for:

Vapor Containment High Radiation Monitors
Reactor Coolant System Subcooling Margin Monitor (SMM),
Overpressure Protection System (OPS), and
Reactor Vessel Level Indication System (RVLIS).

These proposed changes are being made using the guidance provided by Generic Letter 91-04 to accommodate a 24-month fuel cycle. The containment radiation monitors, SMM, and RVLIS are used to provide operator information during post-accident conditions and have no effect on event initiators associated with previously analyzed accidents. The OPS is used only when the plant is shutdown, with RCS temperature below a low temperature limit, and the RCS is not vented. The function of the OPS is to protect the RCS from Low Temperature Overpressurization (LTOP) transients and has no effect on accident initiators. No credit is taken in the IP3 safety analyses for accident mitigation effects that might result from use of these instrument channels. Updated calculations and evaluations to assess the proposed increase in the surveillance intervals demonstrate that the effectiveness of these instrument channels in fulfilling their respective functions is not reduced.

The containment high radiation monitors are used for post accident monitoring purposes to provide operators with an indication of adverse conditions in containment based on releases of radioactivity from the RCS to the containment atmosphere. These monitors provide no signals to plant control systems or automatic safety systems used for accident mitigation and have no role as an accident initiator.

Use of the subcooling margin monitor and core exit thermocouples by plant operators is specified in the Indian Point 3 Emergency Operating Procedures (EOPs) to assess post accident cooling conditions in the RCS. Changes to the EOPs will be made to reflect the results of the updated loop accuracy calculations for this instrumentation. These changes will ensure that safety analysis input assumptions associated with subcooling margin, for small break LOCA, steam generator tube rupture, and steamline break, remain valid, and that the response strategies outlined in the Westinghouse Owners Group Emergency Response Guidelines are maintained. Core exit thermocouple readings are not used for input to plant safety analyses.

The OPS provides a protective function to prevent RCS pressure limits from being exceeded while the plant is shutdown and the RCS is being maintained at a low temperature and not vented. Failure of the OPS is not assumed to be an accident initiator in the plant safety analyses.

The change to the RVLIS calibration interval does not affect design or operation of plant systems and will not affect the probability of accidents. Revised loop accuracy calculations have demonstrated that operator actions for responding to postulated accidents using RVLIS in conjunction with the Indian Point 3 EOPs will remain consistent with the accuracy requirements RVLIS. The consequences of a previously evaluated accident will not be affected.

Equipment and system design requirements and safety analysis acceptance criteria continue to be met with the proposed new surveillance intervals. Based on the above information it is concluded that 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 changes to extend the surveillance frequencies for the above listed instrument channel do not create the possibility of a new or different kind of accident from any previously evaluated. The increased surveillance frequencies were evaluated based on past equipment performance and do not require any plant hardware changes or changes in system operation. There are no new failure modes introduced as a result of extending these surveillance intervals, which could lead to the creation of new or different kinds of accident.

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

Response:

The proposed changes do not involve a significant reduction in a margin of safety. An increased surveillance frequency for the Containment High Radiation Monitor, SMM, OPS, and RVLIS does not adversely affect the performance of safety-related systems, equipment, or instruments and does not result in increased severity of accidents evaluated. The radiation monitor, SMM, and RVLIS are not used to support margins of safety identified in the Technical Specifications. OPS provides an equipment protection function to prevent inadvertent overpressurization of the RCS at shutdown conditions. The Low Temperature Overpressurization (LTOP) curve in the Technical Specifications represents material stress limits based on fracture toughness requirements for ferritic steel. Analysis of the proposed change to the OPS surveillance frequency verified sufficient margin to the LTOP curve and therefore does not involve a significant reduction in margin to the material stress limits.

Section IV - Impact of Changes

The proposed changes will not adversely affect the ALARA Program, the Security and Fire Protection Programs, the Emergency Plan, or the FSAR and SER conclusions. This conclusion is based on the type of changes being made. The proposed extension of the calibration frequency for the containment high radiation monitors, SMM, OPS, and RVLIS to accommodate a 24-month operating cycle will not result in any plant hardware changes or system setpoints.

Changes to the EOPs will be made to reflect the updated uncertainty results associated with the subcooling margin parameter and core exit temperature. The drift monitoring program will be updated to include the affected instrumentation.

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 Final Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any previously evaluated ion the Final Safety Analysis Report; and, c) will not significantly reduce the margin of safety as defined in the bases for any Technical Specification. Therefore, the proposed change involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1. NRC Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate A 24-Month Fuel Cycle."

2. NYPA Letter IPN-96-067, "Proposed Changes to Technical Specifications Regarding Surveillance Intervals for Instrument Channels to Accommodate a 24-month Operating Cycle," dated June 21, 1996.

3. IP3-CALC-RM-02014, Revision 0, "24-Month Operating Cycle Loop Accuracy Calculation for Vapor Containment High Range Monitoring Instrumentation (R25 and R26)."

4. IP3-CALC-RCS-00404, Revision 2, "Overpressure Protection System Loop Uncertainty - Setpoint Calculation."

5. IP3-RPT-UNSPEC-02006, Revision 1, "Core Exit Thermocouple / Subcooling Check and Calibration."

6. IP3-RPT-UNSPEC-02013, Revision 1, "Reactor Vessel Level Instrumentation System Uncertainty Evaluation and Results."

7. IC-AD-34, Revision 0, "Drift Monitoring Program."

8. NYPA Letter IPN-93-007; regarding extending Reactor Protection System test and calibration intervals, dated February 18, 1993.

9. IP3-RPT-UNSPEC-02019, Revision 1, "Safety Evaluation of Containment High Range Monitors Surveillance Interval Extension for 24-month Fuel Cycles."

10. IP3-RPT-UNSPEC-02017, Revision 1, "Safety Evaluation of Subcooling Margin Monitor Surveillance Interval Extension for 24-month Fuel Cycles."

11. IP3-RPT-UNSPEC-02020, Revision 1, "Safety Evaluation of Overpressurization System Functional Test Interval Extension for 24-month Fuel Cycles."

12. IP3-RPT-UNSPEC-02018, Revision 1, "Safety Evaluation of Reactor Vessel Level Instrumentation System Surveillance Interval Extension for 24-month Fuel Cycles."

ATTACHMENT III TO IPN-96-070

COMMITMENTS MADE IN PROPOSED TECHNICAL SPECIFICATION CHANGE FOR RVLIS SURVEILLANCE FREQUENCY REQUIREMENT

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

List of Commitments

Number	Commitment	Due
IPN-96-070-01	Affected components for the containment high radiation monitor, RCS Subcooling Margin Monitor, Overpressure Protection System, and Reactor Vessel Level Indication System instrumentation channels will be added to the drift monitoring program.	Prior to next refueling outage
IPN-96-070-02	Revise the IP3 EOPs to reflect updated instrument loop uncertainty calculations associated with subcooling margin and core exit temperature.	September 25, 1996