

ATTACHMENT I TO IPN-96-107

PROPOSED TECHNICAL SPECIFICATION CHANGES
REGARDING ONE-TIME EXTENSION OF SELECTED
SURVEILLANCE FUNCTIONAL TESTS

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

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E. Containment Isolation Valves

1. Tests and Frequency [See Note A, below]
 - a. Isolation valves in Table 4.4-1 shall be tested for operability at intervals no greater than 30 months (24 months + 25%).
 - b. Isolation valves in Table 4.4-1 which are pressurized by the Weld Channel and Penetration Pressurization System shall be leakage tested as part of the Weld Channel and Penetration Pressurization System Test at intervals no greater than 30 months (24 months + 25%).
 - c. Isolation valves in Table 4.4-1 which are pressurized by the Isolation Valve Seal Water System shall be tested at intervals no greater than 30 months (24 months + 25%) as part of an overall Isolation Valve Seal Water System Test.
 - d. Isolation valves in Table 4.4-1 which are not pressurized will be tested at intervals no greater than 30 months (24 months + 25%).
 - e. Isolation valves in Table 4.4-1 shall be tested with the medium and at the pressure specified therein.
2. Acceptance Criteria
 - a. The combined leakage rate for the following shall be less than 0.5 L_a : isolation valves listed in Table 4.4-1 subject to gas or nitrogen pressurization testing, air lock testing as specified in D.1, portions of the sensitive leakage rate test described in C.1 which pertain to containment penetrations and double-gasketed seals.
 - b. The leakage rate into containment for the isolation valves sealed with the service water system is 0.36 gpm per fan cooler.
 - c. The leakage rate for the Isolation Valve Seal Water System shall not exceed 14,700 cc/hr.

Note A: Leakage testing of containment isolation valves in Table 4.1-1 that become due prior to the next refueling outage may be deferred until the next refueling outage (RO9), but no later than May 31, 1997.

I. Residual Heat Removal System

1. Test

- a. (1) The portion of the Residual Heat Removal System that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 350 psig at the interval specified below.
- (2) The piping between the residual heat removal pumps suction and the containment isolation valves in the residual heat removal pump suction line from the containment sump shall be hydrostatically tested at no less than 100 psig at the interval specified below.
- b. Visual inspection shall be made for excessive leakage during these tests from components of the system. Any significant leakage shall be measured by collection and weighing or by another equivalent method.

2. Acceptance Criterion

The maximum allowable leakage from the Residual Heat Removal System components located outside of the containment shall not exceed two gallons per hour.

3. Corrective Action

Repairs or isolation shall be made as required to maintain leakage within the acceptance criterion.

4. Test Frequency

Tests of the Residual Heat Removal System shall be conducted at least once per 24 months. [See Note A, below]

Note A: Leak testing of the boron injection tank may be deferred until the next refueling outage (RO9), but no later than May 31, 1997.

2. Containment Spray System

- a. System tests shall be performed at least once per 24 months. The tests shall be performed with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.
- b. The spray nozzles shall be checked for proper functioning at least every five years. [See Note A, below]
- c. The tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

3. Containment Hydrogen Monitoring Systems

- a. Containment hydrogen monitoring system tests shall be performed at intervals no greater than six months. The tests shall include drawing a sample from the fan cooler units.
- b. The above tests will be considered satisfactory if visual observations and control panel indication indicate that all components have operated satisfactorily.

Note A: Testing of the spray nozzles may be deferred until the next refueling outage (RO9), but no later than May 31, 1997.

4.8 · AUXILIARY FEEDWATER SYSTEM

Applicability

Applies to periodic testing requirements of the Auxiliary Feedwater System.

Objective

To verify the operability of the Auxiliary Feedwater System and its ability to respond properly when required.

Specification

1.
 - a. Each auxiliary feedwater pump will be started manually from the control room at monthly intervals with full flow established to the steam generators at least once per 24 months.
 - b. The auxiliary feedwater pumps discharge valves will be tested by operator action at intervals not greater than six months.
 - c. Backup supply valves from the city water system will be tested at least once per 24 months. [See Note A, below]
2. Acceptance levels of performance shall be that the pumps start, reach their required developed head and operate for at least fifteen minutes.
3. At least once per 24 months,
 - a. Verify that the recirculation valve will actuate to its correct position.
 - b. Verify that each auxiliary feedwater pump will start as designated automatically upon receipt of an auxiliary feedwater actuation test signal.

Basis

The testing of the auxiliary feedwater pumps will verify their operability. The capacity of any one of the three auxiliary feedwater pumps is sufficient to meet decay heat removal requirements.

Note A: Testing of the backup supply valves may be deferred until the next refueling outage (RO9), but no later than May 31, 1997.

ATTACHMENT II TO IPN-96-107

SAFETY EVALUATIONS FOR THE
PROPOSED TECHNICAL SPECIFICATION CHANGES
REGARDING ONE-TIME EXTENSION OF SELECTED
SURVEILLANCE FUNCTIONAL TESTS

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

**Safety Evaluations for Proposed Technical Specification Changes
Regarding One-Time Extension of Selected
Surveillance Functional Tests**

A. Containment Isolation Valve Seat Leakage

Section 1 - Description of Change

This application for amendment to the Indian Point Unit 3 (IP3) Technical Specifications proposes to revise Section 4.4.E.1 to allow a one-time extension of the surveillance test interval for leak testing the Containment Isolation Valves (CIVs) currently due in January 1997. If approved, these tests will be performed during the next refueling outage (RO9) but no later than May 31, 1997. RO9 is currently scheduled to start in the Spring of 1997. Without this one-time extension, a forced outage will be necessary to perform the required testing. A forced outage will increase the likelihood of undesired events which are more likely to occur during transient operation (heatup and cooldown) than at full power steady-state operation and subject plant equipment to further heatup/cooldown cycles resulting in unnecessary equipment degradation.

The proposed change will revise Technical Specification Section 4.4.E.1 to include a footnote which indicates that leak testing of the CIVs in Technical Specification Table 4.1-1 that become due prior to the next refueling outage may be deferred until the next refueling outage, but no later than May 31, 1997. The technical approach previously followed to increase the test interval from 24 months to 30 months (Technical Specification Amendment 129) was used to evaluate and justify the proposed one-time extension.

In support of the proposed one-time extension in the Technical Specification, a one-time modification of an existing exemption from the test frequency requirements of 10 CFR 50 Appendix J for Type C leak testing, is requested. The modified exemption would allow a one-time extension of up to 4.5 months to the existing test interval for Type C leak testing. Also, relief is requested in accordance with 10 CFR 50.55a from ASME Section XI for the Indian Point 3 Inservice Testing Program. Specifically, Section XI paragraph IWV-3300 requires that position indication for valves with remote indication be observed at least once every 2 years and paragraph IWV-3420 requires that Category A valves shall be leak tested at least once every 2 years. The Inservice Inspection Program currently allows a 25% grace period for a total maximum interval of 30 months.

This application for amendment also proposes an administrative change to delete the following obsolete one-time extension associated with the IP3 Restart and Continuous Improvement Outage:

"During the Restart and Continuous Improvement Outage, leakage testing of the Containment Isolation Valves AC-732, AC-741, AC-MOV-743, AC-MOV-744, and AC-MOV-1870 may exceed the 30-month interval requirement provided the valves are tested prior to T_{avg} exceeding 350°F."

Section II - Evaluation of Changes

In accordance with Technical Specification 4.4.E.1 leak testing of the CIVs shall be conducted at intervals no greater than 24 months plus 25%. Based on the date for the first valve tested in the previous test period, and using a 30-month maximum test interval, the next test of the isolation valves would have to be conducted by January 16, 1997.

The CIVs provide containment isolation during selected design basis accidents to prevent the uncontrolled release of fission products from the core to the environment. Ensuring the leak tightness of the CIVs will preserve the accident analysis assumptions related to the leakage of radioactive fission products from the core to the environment following a design basis accident.

CIV leakage testing is included in two procedures, 3PT-R25, and 3PT-R35. 3PT-R25 tests valves associated with the Isolation Valve Seal Water System (IVSWS) and 3PT-R35 tests containment isolation valves associated with the Weld Channel Containment Penetration Pressurization System (WCCPPS). The previous 3PT-R25 test began on August 17, 1994 and was completed over a time span of seven months. The valve with the largest single contribution to overall system leakage (the steam generator blowdown header, with 50% of total system leakage) was tested on November 11, 1994. The last completed 3PT-R35 test period began on July 31, 1994 and extended for a period of approximately six months, with many of the valves being tested at least three months after the first test.

It should be noted that the CIV leakage measured by these two tests have different acceptance criteria, in accordance with 10CFR50, Appendix J, Section III.C.3. Appendix J stipulates that leakage from CIVs that are sealed with fluid from a seal leakage system may be excluded when determining the combined leakage rate provided the following requirements are met:

- (a) Such valves have been demonstrated to have fluid leakage rates that do not exceed those specified in the technical specifications or associated bases, and
- (b) The installed isolation valve seal-water system fluid inventory is sufficient to assure the sealing function for at least 30 days at a pressure of 1.10 Pa.

IP3's IVSWS meets these requirements. Requirement (a) is satisfied by Technical Specification 4.4.E.2.c which specifies the allowable leakage for the IVSWS, and past tests have met this limit. Requirement (b) is met because the IVSWS has a 30-day supply of fluid maintained at 1.10 Pa. As such, leakage associated with the valves tested by procedure 3PT-R25 is not included in the combined leakage rate that would be compared to the $0.5 L_a$ acceptance criteria stipulated in Technical Specification 4.4.E.2.a. The leakage criteria of $0.5 L_a$ applies to CIVs tested under 3PT-R35.

Past test results show good performance of the CIVs with respect to leak tightness. While leak rate testing is one measure of performance, it does not assess all aspects of valve performance. The Authority is presently monitoring the containment isolation system as 'Category (A)(1)' under the Maintenance Rule (10 CFR 50.65) to address ten maintenance preventable functional failures (MPFFs) associated with this system. The Authority has implemented an action plan to address MPFFs involving conditions such as limit switch adjustment, valve packing, corrosion, and

operator spring tension adjustment. Corrective actions are being taken and are planned for implementation during the next refueling outage, RO9. The proposed one-time extension of CIV leak testing will not delay the implementation of these corrective actions and will not result in additional CIV MPFFs. The occurrence of new MPFFs will be monitored to determine the effectiveness of the corrective actions. The containment isolation system will be considered for 'Category (A)(2)' following completion of the corrective actions planned for RO9 and when there are no new MPFFs for a period of six months. The target completion date to achieve Category (A)(2) is December 1997, based on the current schedule for RO9.

Isolation Valve Seal Water System Leak Testing (Test 3PT-R25)

The IVSWS helps to reduce leakage from the containment following a design basis accident by injecting high pressure nitrogen or seal water into the CIVs in the stem and disk areas or into the piping between CIVs. Depending on the function of the valve post-LOCA, high pressure nitrogen or water is injected into the valves either manually, or automatically by any safety injection signal and is maintained at a pressure slightly above the containment accident peak pressure. When pressurized to this limit the IVSWS prevents leakage of the containment atmosphere through the CIVs. Although no credit is taken in the safety analysis for the function of this system, the IVSWS leak test does verify that the leakage of certain CIVs meets the leakage criteria for Type C valves.

A review of the past two functional tests on the IVSWS leakage shows that the actual system leakage has been within the allowable limit of 14,700 cc/hr (Technical Specification 4.4.E.2.c). Measured leakage from the most recent surveillance test (initiated on August 17, 1994) is 88% of the allowable limit.

Containment Isolation Valve Leak Testing (3PT-R35)

CIVs which have WCCPPS gas applied to them are leak tested under 3PT-R35. The WCCPPS provides air and/or nitrogen gas at a pressure greater than the peak accident containment pressure profile to containment penetrations and weld channels, containment personnel and equipment hatches, and between certain CIVs. Unlike the IVSWS, the WCCPPS is continuously pressurized to these levels when the plant is above cold shutdown.

The allowable leakage criteria for the CIVs tested in this procedure was reduced from $0.6 L_a$ to $0.5 L_a$ when the surveillance interval was increased from 24 to 30 months. A review of the past four leak tests conducted in accordance with test procedure 3PT-R35 shows that the valves met the criteria in three out of the four tests. The test of June 1989 identified several valves that did not maintain sufficient test fluid pressure to allow a determination of the valve leakage rate. All valves were restored to operable status prior to the next plant startup. Since that test the next two tests were passed with large margins to the leakage criteria of $0.5 L_a$. The test run in late 1992 measured leakage less than 14% of the criteria and the test run in early 1995 measured less than 29% of the criteria. Subsequent valve repairs reduced this leakage to approximately 13% as determined by retesting.

The WCCPPS performs an on-line leak monitoring function for isolation valves serviced by that system which are normally in the closed position during power operation. Each day, containment leakage is calculated using online monitoring with the WCCPPS. The daily leak calculation provides trend data to identify changes in leakage that require corrective action. Recent data

indicates that the calculated leakage has been significantly less than the established limit of 10 SCFM.

Margin from Previous Tests

The request for a one-time extension of the 30-month surveillance limit for testing CIV leakage involves an extension from January 16 to May 31, 1997 (about four months), or a 15% increase in the surveillance interval. In order to accommodate this extension, the previous leak test data acquired using 3PT-R35 was evaluated against a reduced criteria that includes 15% additional margin. This criteria, decreased in proportion to the surveillance interval extension, is $0.425 L_a$. As noted above, the leakage measured during the last performance of 3PT-R35 was less than 30% of the allowable limit of $0.5 L_a$, (i.e. $0.15 L_a$), and less than the more restrictive criteria identified above.

The request for extending the surveillance interval for testing CIV leakage using the IVSWS can safely be extended based on the conservative system design, periodic monitoring of the system, the fact that no credit is taken for system operation in the calculation of accident doses, and the fact that the more restrictive criteria has been met in the most recent tests.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application does not involve significant hazards consideration based on the following:

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

Response:

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The probability of a previously evaluated accident will not increase because CIV leakage does not provide any role in accident initiation. The CIVs provide containment isolation following a design basis accident.

The consequences of an accident previously evaluated will not significantly increase because the CIV leakage measurements contain significant margin to a more restrictive criteria based on the requested surveillance interval extension. As discussed in Section II, "Evaluation of Changes," based on an evaluation of past CIV leak tests, the proposed change will not result in an increase in containment leakage because the measured leakage in previous CIV leak tests shows large margin to a more restrictive criteria based on the requested surveillance interval extension. Also, the latest test of IVSWS satisfied the established acceptance criteria.

- (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 license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change only provides for a relatively short, one-time extension of the current leak-test interval for certain containment isolation valves. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner different from that addressed in the Final Safety Analysis Report. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response:

The proposed amendment does not involve a significant reduction in a margin of safety. The proposed change, for a one-time extension of the test interval, will not result in a significant reduction in a margin of safety because the test interval is being extended by only a short period and the measured leakage in previous CIV leak tests shows large margin to a more restrictive criteria based on the surveillance interval extension. In addition, the online leakage monitoring capability of the WCCPPS helps ensure that changes in CIV leakage during the extension period will be detected. Therefore, this change does not create a significant reduction in a margin of safety.

Section IV - Conclusion

The incorporation of this change: a) will not significantly increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not create the possibility of 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. Therefore, this change does not involve significant hazards consideration as defined in 10CFR50.92.

B. Boron Injection Tank Leakage Test

Section 1 - Description of Change

This application for amendment to the Indian Point 3 (IP3) Technical Specifications proposes to revise Section 4.4.1.4 to allow a one-time extension of the Boron Injection Tank (BIT) leakage test (3PT-R127) due in March 1997. This surveillance is one of the tests used to verify that leakage of the Safety Injection (SI) and Residual Heat Removal (RHR) systems outside of containment are within acceptable limits. If approved, this test will be performed during the next refueling outage (RO9) but no later than May 31, 1997. RO9 is currently scheduled to start in the spring of 1997. Without this one-time extension, a forced outage may be necessary to perform the required testing. The forced outage will increase the probability of undesired events which are more likely to occur during transient operation (heatup and cooldown) than at full power steady state operation and subject plant equipment to further heatup/cooldown cycles resulting in unnecessary equipment degradation. The proposed change would revise Section 4.4.1.4 of the Technical Specification to include a footnote. The footnote

would indicate that the leak testing of the BIT may be deferred until the next refueling outage but no later than May 31, 1997.

Section II - Evaluation of Changes

In accordance with Section 4.4.1.4 of the Technical Specification, the BIT leakage test shall be conducted once every 24 months. Including a 25% extension allowance beyond a nominal 24-month fuel cycle, consistent with Technical Specification 1.12, the next test of the BIT (and associated piping) would have to be conducted by March 1997.

The BIT leakage test which includes a subset of safety injection system piping and valves in the vicinity of the BIT is normally performed at a nominal refueling cycle interval with the plant in cold shutdown. This plant alignment is preferred because the safety injection system is made inoperable by the test.

The BIT leakage test provides assurance that in the event of accident mitigation requiring high head recirculation, leakage of potentially contaminated fluid outside of the containment will be minimal. The basis for the requirement is related to the accident analysis dose limits for control room personnel and offsite receptors. The allowable Technical Specification total leakage limit for SI and RHR systems outside containment is currently 2 gph. A pending Technical Specification change (Power Authority letter IPN-96-063 to the NRC dated June 11, 1996) proposes to reduce the allowable leakage limit from the RHR and SI systems outside containment to 1.09 gph without any PAB exhaust filtration in service.

A review of the three most recent BIT leakage tests performed over the past six years shows that the leakage has always been significantly less than the acceptance criteria for total leakage of the SI and RHR systems outside of containment. In the most recent test (October 1994), BIT leakage was less than 0.05 gallons per hour (gph). Periodic tests on other components during the time period from October 1994 to August 1996, when combined with the latest BIT leakage test result, provide a trend of total SI and RHR leakage outside containment. The highest combined result during this period is less than 0.1 gph and the latest result as of mid-August is less than 0.08 gph. These results are well below the current limit of 2 gph and the pending new limit of 1.09 gph. Normal monthly testing of the SI pumps, which circulates water through the BIT and associated piping, would alert plant operators of gross leakage and provides additional assurance of system integrity.

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 for the BIT leakage.

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

Response:

The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change will not degrade the integrity of the BIT piping outside containment because no time

dependent failure trends were observed in the review of past test results. The probability of a previously evaluated accident will not be increased because BIT leakage does not provide any role in accident prevention. The BIT leakage test only verifies that the BIT and associated piping meet specified leakage limits .

The consequences of an accident previously evaluated will not significantly increase because the BIT leakage test results show large margins to the allowable leakage limit.

- (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 license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that's different from that addressed in the Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the integrity of the BIT piping and will not result in any new failure modes. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response:

The proposed license amendment does not involve a significant reduction in a margin of safety. Because of the large margin between the previous test and the allowable leak rate limit, the proposed change, for a one-time extension of the test interval, for the BIT leakage test does not adversely affect the performance of any safety related system, component, and does not result in increased severity of any of the accidents considered in the Final Safety Analysis Report. Based on past test results, the one-time extension of the leak test interval does not involve a significant reduction in a margin of safety.

Section IV - Conclusion

The incorporation of this change: a) will not significantly increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not create the possibility of 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. Therefore, this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

C. Containment Spray Nozzle Test

Section I - Description of Change

This application for amendment to the Indian Point 3 (IP3) Technical Specifications proposes to revise Section 4.5.A.2.b to allow a one-time extension of the surveillance test interval for the functional test of the Containment Spray Nozzles due in January 1997. If approved, these tests will be performed during the next refueling outage (RO9) but no later than May 31, 1997. RO9 is currently scheduled to start in the Spring of 1997. Without this one-time extension, a forced outage may be necessary to perform the required testing. The forced outage will increase the probability of undesired events which are more likely to occur during transient operation (heatup and cooldown) than at full power steady state operation and subject plant equipment to further heatup/cooldown cycles resulting in unnecessary equipment degradation. The proposed change would revise Technical Specification Section 4.5.A.2.b to include a footnote. The footnote would indicate that the functional testing of the Containment Spray Nozzles may be deferred until the next refueling outage but no later than May 31, 1997.

Section II - Evaluation of Changes

In accordance with Technical Specification 4.5.A.2.b, a functional test of the Containment Spray Nozzles (3PT-5Y1) shall be conducted once every 5 years. Based on a 6.25 year test interval, which includes a 25% extension allowance for surveillance intervals per Technical Specification 1.12, the next test of the nozzles would have to be conducted by January 1997. This application for an amendment proposes a one-time test interval extension that would allow the functional test to be conducted during the next refueling outage, but no later than May 31, 1997.

The Containment Spray Nozzles are designed to provide a uniform spray of cooling water inside containment during loss of coolant and steam line rupture accidents. The functional test of the Containment Spray Nozzles is normally performed at a frequency of five years with the plant in cold shutdown. This plant alignment is required because the test makes the containment spray system inoperable. Spray line spool pieces are removed and a large amount of compressed air is introduced into the system. The test requires hoses to be run through the containment equipment hatch (with both doors open) which is not permitted while the plant is at power. Alternate methods of injecting air using piping connections outside of containment were investigated, but no connections of sufficient size are available.

A review of the three most recent tests over the past sixteen years of functional tests on the Containment Spray Nozzles show that the nozzles have always passed the test, based on infrared monitoring, at the spray nozzles, of heated air that was injected into the containment spray headers.

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 for the Containment Spray Nozzles.

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

Response:

The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. As discussed in Section II, "Evaluation of Changes," based on an evaluation of past test results the proposed change will not degrade the reliability of the Containment Spray Nozzles because no time dependent failure trends were observed in the data review. The probability of a previously evaluated accident will not be increased because the Containment Spray Nozzles do not provide any role in accident prevention. The Containment Spray Nozzles provide a uniform spray distribution for containment cooling following postulated post-accident conditions.

The consequences of an accident previously evaluated will not increase because the Containment Spray Nozzle reliability is not degraded by this change.

- (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 license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the functioning of the Containment Spray Nozzles and will not result in any new failure modes. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response:

The proposed license amendment does not involve a significant reduction in a margin of safety. The proposed change, for a one-time extension of the test interval, for the Containment Spray Nozzles does not adversely affect the performance of any safety related system, component, or instrument, or safety system setpoints and does not result in increased severity of any of the accidents considered in the Final Safety Analysis Report. Based on past test results, the one-time extension of the functional test interval will not adversely affect the functioning of the Containment Spray Nozzles. Therefore, this change does not create a significant reduction in a margin of safety.

Section IV - Conclusion

The incorporation of this change: a) will not significantly increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not create the possibility of 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. Therefore, this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.

D. City Water Backup Supply Valves to Auxiliary Boiler Feedpump

Section 1 - Description of Change

This application for amendment to the Indian Point 3 (IP3) Technical Specifications proposes to revise Section 4.8.1.c to allow a one-time extension for the functional test of the City Water Backup Supply Valves for the Auxiliary Boiler Feedpump (ABFP) due in March 1997. If approved, these tests will be performed during the next refueling outage (RO9) but no later than May 31, 1997. RO 9 is currently scheduled to start in the spring of 1997. Without this one-time extension, a forced outage may be necessary to perform the required testing. The forced outage will increase the probability of undesired events which are more likely to occur during transient operation (heatup and cooldown) than at full power steady state operation and subject plant equipment to further heatup/cooldown cycles resulting in unnecessary equipment degradation. The proposed change would revise Technical Specification Section 4.8.1.c to include a footnote. The footnote would indicate that the functional testing of the City Water Backup Supply Valves may be deferred until the next refueling outage but no later than May 31, 1997.

Also, relief is requested in accordance with 10 CFR 50.55a from ASME Section XI for the Indian Point 3 Inservice Testing Program. Specifically, Section XI paragraph IWV-3300 requires that position indication for valves with remote indication be observed at least once every 2 years and paragraph IWV-3420 requires that Category A valves shall be leak tested at least once every 2 years. The Inservice Testing Program currently allows a 25% grace period for a total maximum interval of 30 months.

Section II - Evaluation of Changes

In accordance with Technical Specification 4.8.1.c, a functional test of the City Water Backup Supply Valves for the ABFP shall be conducted once every 24 months. Including a 25% extension allowance for surveillance intervals per Technical Specification 1.12, the next test of the valves would have to be conducted by March 1997. This application for an amendment proposes a one-time test interval extension that would allow the functional test to be conducted during the next refueling outage, but no later than May 31, 1997. The request for the test interval extension is based on the following technical justification.

The City Water Backup Supply Valves provide an alternate source of auxiliary feed water in the event that the normal source (the condensate storage tank) is depleted or otherwise unavailable for accident mitigation. The condensate storage tank minimum volume requirement is sufficient to maintain decay heat removal for at least 24 hours with the plant in hot shutdown, which is normally sufficient for the transition to the RHR system for decay heat removal. Therefore no credit is taken in the safety analysis for the function of this system.

The functional test of the City Water Backup Supply Valves for the AFW System is normally performed at a refueling cycle frequency with the plant in cold shutdown. This plant alignment is

required during the test to prevent the introduction of city water into the condensate system and steam generators. It is undesirable to perform this test on-line because city water does not meet chemistry specifications for use in the auxiliary feedwater system and steam generators, under normal circumstances. The system is normally flushed after testing to prevent contaminating the clean auxiliary feedwater portions of the system. This requires isolation and prevents auxiliary feedwater pump automatic start capability. If an automatic start of the auxiliary feedwater pumps occurs during testing, city water would be introduced into the steam generators.

A review of the four most recent tests performed over the past six years on the City Water Backup Supply Valves for the AFW System shows that the valves have always passed the test, based on valve stroke time being within the acceptance criteria. During the most recent test, conducted October 1994, the measured valve opening stroke times ranged from 6 seconds to 10.7 seconds compared to an acceptance criterion of 20 seconds.

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 for the City Water Backup Supply Valves for the AFW System.

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

Response:

The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change will not degrade the reliability of the City Water Backup Supply Valves for the AFW System because no time dependent failure trends were observed in the review of past test results. The probability of a previously evaluated accident will not increase because the City Water Backup Supply Valves for the AFW System do not provide any role in accident prevention. The City Water Backup Supply Valves for the AFW System only provides a diverse source of water for the AFW system.

The consequences of an accident previously evaluated will not significantly increase because the City Water Backup Supply Valves for the AFW System are not assumed to function to mitigate any analyzed accident.

- (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 license amendment does not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change does not involve the addition of any new or different type of equipment, nor does it involve operating equipment required for safe operation of the facility in a manner that is different from that addressed in the Final Safety Analysis Report. Also, the increased surveillance interval (one-time only) will not adversely affect the functioning of the City Water Backup Supply Valves for the ABFP and will not result in any new failure modes. Therefore, the

proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response:

The proposed amendment does not involve a significant reduction in a margin of safety. The proposed change, for a one-time extension of the test interval, for the City Water Backup Supply Valves for the ABFP does not adversely affect the performance of any safety related system, component, or instrument, or safety system setpoints and does not result in increased severity of any of the accidents considered in the Final Safety Analysis Report. Based on past test results, the one-time extension of the functional test interval will not adversely affect the functioning of the City Water Backup Supply Valves for the AFW System. Therefore, this change does not create a significant reduction in a margin of safety.

Section IV - Conclusion

The incorporation of this change: a) will not significantly increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not create the possibility of 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. Therefore, this change does not involve a significant hazards consideration as defined in 10 CFR 50.92.