

Indian Point 3
Nuclear Power Plant
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Robert J. Barrett
Site Executive Officer

April 15, 1997
IPN-97-050

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
**Clarification of Amendment 166 to the Indian Point 3 Technical Specifications;
Regarding One-time Deferral of Steam Generator Tube Inspection**

- References:
1. NYPA letter IPN-96-027 to NRC, regarding proposed amendment to Technical Specifications, dated March 14, 1996.
 2. NRC letter to NYPA, regarding issuance of Amendment 166, dated June 19, 1996.

Dear Sir:

This letter documents the Authority's understanding of the wording associated with Amendment 166 to the Indian Point 3 Technical Specifications regarding a one-time deferral of the steam generator tube inspection. The Authority requested (Reference 1) a one-time deferral of the inspection interval specified by Technical Specification 4.9.A.4 so that steam generator tube inspections could be conducted during the next scheduled refueling outage. The requested amendment proposed the following note be added to Specification 4.9.A.4:

"...the surveillance related to the steam generator tube inspection due no later than July 1996, may be deferred until the next refueling outage but no later than May 31, 1997."

The intent of this notation is to allow operability of the steam generators to be maintained, for purposes of meeting Specification 3.4.A(6), through May 31, 1997 without performing the specified surveillance. Failure to demonstrate continued operability, by performing the surveillance inspection prior to May 31, 1997, would require the plant to be placed in a condition where steam generator operability is not required. The wording of the notation also prevents the deferral from being used to extend the surveillance beyond the next refueling outage, in the event that outage occurred prior to May 31, 1997. It is not the intent of the notation to establish a firm calendar due date by which the steam generator tube inspections must be completed.

It is the Authority's understanding that the following paraphrased wording of the requested amendment in the NRC Safety Evaluation Report (Reference 2) also did not intend to establish a

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firm calendar due date condition which is more restrictive than Technical Specification requirements for steam generator tube inspection.

"The request would allow the licensee to delay the inspection until the next refueling outage or until May 31, 1997, whichever comes first."

We believe our understanding is consistent with our existing license (Technical Specification 4.1) which states in part:

"Performance of any surveillance test outlined in these specifications is not required if the plant condition is the same as the condition into which the plant would be placed by an unsatisfactory result of that test."

The Authority is making no new commitments in this letter. We respectfully request that you notify us as soon as possible if your understanding of this Amendment differs from ours. If you have any questions regarding this matter, please contact Mr. Ken Peters at (914) 736-8029.

Very Truly Yours,



Robert J. Barrett
Site Executive Officer
Indian Point 3 Nuclear Power Plant

cc: Regional Administrator
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