

123 Main Street
White Plains, New York 10601
914 681.6840
914 287.3309 (FAX)



James Knubel
Senior Vice President and
Chief Nuclear Officer

November 3, 1997
IPN-97-149

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

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Proposed Exemption From Requirements of 10 CFR 50.60 and
Proposed Technical Specification Changes Associated With
Pressure-Temperature and Overpressure Protection System
Limits for Up To 13 Effective Full Power Years

- References:
1. NRC Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996.
 2. ABB Combustion Engineering Report, "Final Report on Pressure-Temperature Limits for Indian Point 3 Nuclear Power Plant," dated July 1990.
 3. NYPA letter to the NRC (IPN-90-046), "Proposed Changes to Technical Specifications Regarding Pressure-Temperature Limits," dated August 31, 1990.

Dear Sir:

In accordance with 10 CFR 50.12 and 10 CFR 50.90, this letter requests an exemption from 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Light-Water Nuclear Power Reactors For Normal Operation," and an amendment to the Indian Point 3 Technical Specifications. The exemption request would allow Indian Point 3 to use the American Society of Mechanical Engineers (ASME) Code Case N-514 in lieu of the requirements listed in 10 CFR 50.60. This code case is endorsed by a draft revision to Regulatory Guide (RG) 1.147, published by the NRC in February 1997. Therefore, this exemption is only needed until the RG is amended. Justification for this exemption request is presented in Attachment I.

The application for amendment seeks to revise Sections 1, 3.1, 3.3, 4.3, and 6 of Appendix A of the Indian Point 3 Technical Specifications. These revisions extend the Heatup-Cooldown limits from 11 to 13 effective full power years (EFPYs), provide the corresponding Overpressure Protection System (OPS) limits, relocate the new pressure temperature limit curves and low temperature OPS limits to the pressure temperature limit report (PTLR) (in accordance with Reference 1), and include some minor revisions which ensure specification clarity and conservatism.

ADK
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P PDR



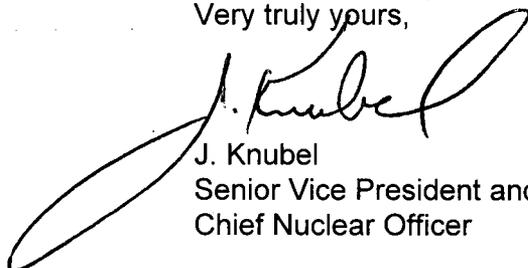
The revisions contained in this amendment application for the pressure-temperature limits are based on Reference 2 which was previously submitted with Reference 3. The revisions associated with the OPS limits are based upon Reference 2 and ASME Code Case N-514. The use of this code case is the subject of the attached exemption request (Attachment I).

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License," together with Attachments II and III, comprising a statement of the proposed changes to the Technical Specifications and the associated Safety Evaluation. A mark-up of the affected Technical Specification pages is provided in Attachment IV and a listing of new commitments is included as Attachment V. Attachment VI contains a draft copy of the Indian Point 3 PTLR. Once approval of this amendment is received, a final PTLR will be prepared and sent to the NRC within 45 days of its issuance.

In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

Indian Point 3 is currently operating with Technical Specification requirements which are valid up to 11 EFPYs. Indian Point 3 is expected to exceed 11 EFPYs approximately March 19, 1998. Therefore, approval of this amendment request is respectfully requested prior to that date. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Knubel", is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

J. Knubel
Senior Vice President and
Chief Nuclear Officer

Attachments: As stated
cc: See next page

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

Mr. F. William Valentino, President
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. George F. Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, DC 20555