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James Knubel
Senior Vice President and
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March 20, 1998
IPN-98-034

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

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Response to Request for Additional Information Regarding
Amendment to P-T Curves

- References:
1. NRC letter, G. Wunder to J. Knubel, "Request for Additional Information Regarding Amendment to P-T Limit Curves (TAC No. M99928)," dated March 10, 1998.
 2. NYPA letter, J. Knubel to NRC (IPN-97-149), "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," dated November 3, 1997.
 3. NYPA letter (IPN-98-013), J. Knubel to NRC, "Proposed Exemption From Requirements of 10 CFR 50.60 to Utilize Alternate Methodology to determine K_{IT} ," dated January 28, 1998.
 4. NYPA letter to NRC (IPN-98-015), "Response to Request for Additional Information on Proposed Technical Specification Changes Regarding Pressure-Temperature Limits," dated February 6, 1998.
 5. NYPA letter to NRC (IPN-98-023), "Response to Request for Additional Information on Proposed Technical Specification Changes Regarding Overpressure Protection System Limits," dated February 27, 1998.
 6. NYPA letter to NRC (IPN-98-024), "Response to Request for Additional Information on Proposed Technical Specification Changes Regarding Overpressure Protection System Limits," dated February 27, 1998.

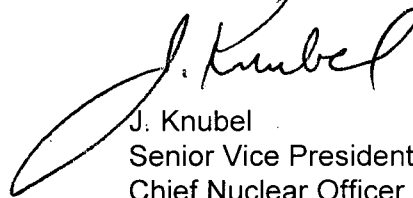
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Dear Sir:

This letter provides a response to the NRC's request for additional information (Reference 1). The request is in regards to the Authority's proposed Technical Specification changes to the pressure-temperature and overpressure protection system (OPS) limits (References 2 through 6). Reference 1 requested that NYPA review the topical reports which were referenced in Attachment II of Reference 5 to verify that any conditions or restrictions specified in the NRC Safety Evaluation Reports (SERs) for these reports were met. Specifically, Reference 1 required the Authority to list any conditions or restrictions found in these SERs and provide verification that, or an explanation of how, they were met.

This submittal does not alter the no significant hazards determination presented in Reference 5 and contains no new commitments. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel
Senior Vice President and
Chief Nuclear Officer

Attachments: as stated
cc: see next page

cc: Regional Administrator
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ATTACHMENT I TO IPN-98-034

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING THE
AMENDMENT TO P-T LIMIT CURVES**

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

Response to Request for Additional Information

The NRC requested that the Authority review the references cited in Attachment II of IPN-98-023 (Reference 1) to determine if any conditions or restrictions were placed upon the use of these references by the NRC through the issuance of Safety Evaluation Reports (SERs). The analyses which were utilized to support the proposed Technical Specification changes for the pressure-temperature and overpressure protection system limits were performed by ABB Combustion Engineering and Westinghouse. The Authority's discussions with ABB Combustion Engineering and Westinghouse indicated that the vendors' Appendix B programs require that they comply with any requirements or conditions imposed by the NRC in SERs approving their codes or methodologies. Further, as part of the Authority's Appendix B program, vendor audits are conducted. A requirement can be added to the Authority's vendor audit program to specifically audit vendor's compliance with SER conditions and restrictions. The Authority believes that these processes are sufficient to ensure that NRC imposed conditions and restrictions are met. However, in light of the request for additional information, the Authority reviewed the references listed in Attachment II of Reference 1.

A review of Attachment II of IPN-98-023 indicated that this calculation did not reference any topical vendor or licensee reports that were submitted to the NRC for methodology or code approval. However, the Authority did review the Indian Point 3 plant specific documents prepared by ABB Combustion Engineering (ABB-CE), Westinghouse, and NYPA which were referenced in this calculation to determine if any of these reports were previously submitted to the NRC as part of an Authority submittal for which an SER was received (i.e., Technical Specification amendment request). This review determined that references 6.1 and 6.3 were submitted to the NRC as backup documentation for Technical Specification amendment requests. Therefore, the NRC SERs approving these amendment requests (References 2 and 3) were reviewed to determine if any conditions or restrictions were placed upon the use of these documents. No such conditions or restrictions were found during this review.

The Authority believes that this request for information represents a new NRC expectation for approval of licensing submittals which was not previously communicated to licensees. Further discussions between the NRC, licensees, and industry groups on this topic would help to clarify NRC expectations.

References

1. NYPA letter to NRC (IPN-98-023), "Response to Request for Additional Information on Proposed Technical Specification Changes Regarding Overpressure Protection System Limits," dated February 27, 1998.
2. NRC letter, F. Williams to R. Beedle, "Issuance of Amendment for Indian Point 3 TAC No. 71505)," Amendment 109, dated August 28, 1991.
3. NRC letter, N. Conicella to R. Beedle, "Issuance of Amendment for Indian Point 3 Nuclear Generating Unit No. 3 (TAC No. M82062)," Amendment 121, dated June 18, 1992.