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James Knubel
Senior Vice President and
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April 16, 1998
IPN-98-043

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed Changes to Technical Specifications Regarding Instrument Channel
Surveillance Intervals to Accommodate a 24-Month Operating Cycle**

- References:
1. NRC Letter to New York Power Authority, "Issuance of Amendment 168 for Indian Point 3," G. Wunder to W. Cahill, Jr., dated September 5, 1996.
 2. NRC Letter to New York Power Authority, "Issuance of Amendment 169 for Indian Point 3," G. Wunder to W. Cahill, Jr., dated September 24, 1996.
 3. Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991.

Dear Sir:

This application for amendment to Table 4.1-1 of the Indian Point 3 Technical Specifications proposes to change surveillance frequency requirements for the following instrument channels to accommodate a 24-month operating cycle:

- Pressurizer Water Level
- Accumulator Level and Pressure
- Reactor Coolant System Subcooling Margin Monitor
- Core Exit Thermocouples
- Reactor Vessel Level Indication System

The justification for the proposed new surveillance frequency follows the same approach that was used to support previously approved changes (References 1 and 2). Consistent with Generic Letter 91-04 (Reference 3), the Authority performed an integrated evaluation of surveillance interval increases to confirm acceptability with respect to plant safety analyses. Recent revisions of safety analyses included the effects of increased instrument drift over a maximum calibration interval of 30 months (24 months + 25%). This application for amendment describes a change in containment internal pressure to reflect the results of the updated safety analyses.

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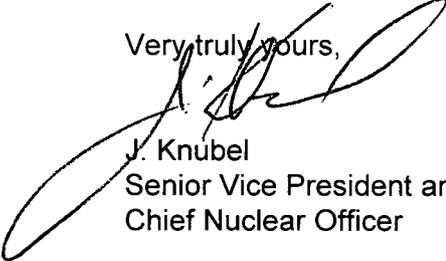
This application for amendment also contains administrative changes to delete various notes that provided one-time extensions of certain tests and surveillances. These one-time extensions supported the planned schedule for refueling outage 9 that was completed in 1997.

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License." Attachment I to this application contains the proposed new Technical Specification pages and Attachment II is the associated Safety Evaluation. A markup of the current Technical Specification pages showing the proposed changes is provided in Attachment III, for information only. 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.

The Authority requests review of this application for amendment prior to the scheduled surveillance dates. The earliest surveillance due date (18-month interval, not including the Technical Specification grace period allowance) is October 18, 1998 for the Core Exit Thermocouples. The commitments made by the Authority to support the proposed Technical Specification changes are stated in Attachment IV.

If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel
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cc: Regional Administrator
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