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James Knubel
Senior Vice President and
Chief Nuclear Officer

April 16, 1998
IPN-98-044

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
Emergency Diesel Generator Testing**

Dear Sir:

This application for amendment to section 3.7.B.1 of the Indian Point 3 Technical Specifications proposes to modify a testing requirement for the emergency diesel generators (EDG). The proposed change is consistent with the Standard Technical Specifications and is intended to reduce unnecessary EDG testing as recommended by Generic Letter 84-15. The current specification requires that, whenever an EDG becomes inoperable for any reason other than preplanned preventive maintenance or testing, the remaining EDGs must be tested within 24 hours. The proposed change will allow an evaluation for potential common-cause failures to be used as an alternative to testing. Changes to the Technical Specification Basis are also proposed to explain this alternative.

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License." Attachment I to this application is the proposed new Technical Specification, including the revised Basis page, 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.

There are no new commitments contained in this submittal. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to read 'J. Knubel'.

J. Knubel
Senior Vice President and
Chief Nuclear Officer

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cc: next page

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