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IPN-98-091

U.S. Nuclear Regulatory Commission
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Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Supplement to Proposed Changes to Technical Specifications
Regarding Emergency Diesel Generator Testing**

- References:
1. NYPA letter (IPN-98-044), J. Knubel to NRC, "Proposed Changes to Technical Specifications Regarding Emergency Diesel Generator Testing," dated April 16, 1998.
 2. NRC letter, N. Conicella to R. Beedle, regarding issuance of Indian Point 3 Facility Operating License Amendment 132, dated May 5, 1993.

Dear Sir:

This supplement to the proposed technical specification change submitted by Reference 1 provides additional information regarding the proposed deletion of the word 'preventive' from the phrase 'preplanned preventive maintenance' in the current specification, 3.7.B.1. This supplement provides additional explanation of the change but does not modify the previously proposed changes. The 'No Significant Hazards Evaluation' and 'Conclusions' of the Safety Evaluation transmitted in the referenced letter are also not changed.

The purpose of the change proposed in Reference 1 is to allow evaluation of potential common-cause failures of the Emergency Diesel Generators (EDG) as an alternative to testing, consistent with Generic Letter 84-15 and the Standard Technical Specifications (NUREG 1431, Section 3.8).

The current Indian Point 3 Technical Specification 3.7.B.1 and the proposed new specification each contain an applicability statement to define the condition in which the required actions need not be taken. The current applicability statement identifies 'preplanned *preventive* maintenance or testing' as allowable conditions for which the required actions need not be taken. The proposed change deletes the qualifier 'preventive' because preplanned *corrective* maintenance also involves a condition which does not call into question the operability of the EDG. This change to the specification makes the proposed applicability statement consistent with the existing Bases established in Technical Specification Amendment 132 (Reference 2),

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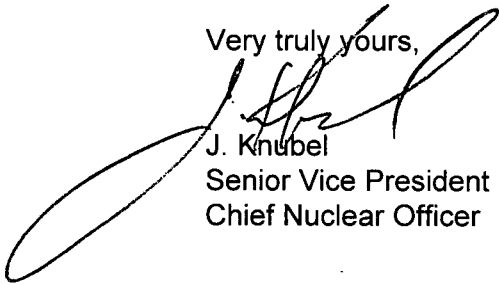
regarding 'preplanned corrective maintenance.' The following is an excerpt from the existing Bases:

"If a diesel generator is out of service due to preplanned maintenance or testing, special surveillance testing of the remaining diesel generators is not required because the required periodic surveillance testing suffices to provide assurance of their operability. The fact that preplanned corrective maintenance is sometimes performed in conjunction with this preventive maintenance or testing does not necessitate that the remaining diesels be tested, because this corrective maintenance is on defects or potential defects that never called diesel operability into question."

Therefore the proposed deletion of the word 'preventive' is consistent with the Bases in that preplanned maintenance can involve corrective or preventive maintenance.

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

Very truly yours,



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