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James Knobel
Senior Vice President and
Chief Nuclear Officer

November 25, 1998
IPN-98-127

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed One-Time Emergency Change to the Technical
Specification Testing Requirements for Seven Residual Heat
Removal and Safety Injection Containment Isolation Valves**

Dear Sir:

This letter requests a one-time emergency change to the Indian Point 3 Technical Specifications in Table 4.4-1.

This one-time emergency Technical Specification change is needed to be in effect until startup from the next refueling outage, RO10. The outage is presently scheduled to begin in September 1999. At that time, action will be taken to correct issues associated with the seven affected containment isolation valves.

Specifically, the proposed Technical Specification change would allow Indian Point 3 to use water (pressurized by nitrogen) as a medium to perform Type C local leak rate testing of seven containment isolation valves (AC-732, AC-MOV-743, AC-MOV-744, SI-MOV-888A, SI-MOV-888B, AC-AOV-958 and AC-MOV-1870). The change would allow the previous testing performed without first draining the associated lines of water, to be sufficient until the upcoming refueling outage. The plant conditions required to achieve nitrogen testing now would prevent resumption of operation. This is because compliance with Technical Specification Table 4.4-1 currently requires these valves to be tested using nitrogen. Draining the lines associated with AC-732 and AC-MOV-744 would require an interruption of residual heat removal which would necessitate either head removal and flooding the refueling canal and possibly a reactor core offload. Draining of the lines associated with AC-MOV-743, SI-MOV-888A, SI-MOV-888B, AC-AOV-958 and AC-MOV-1870 would require isolating the residual heat removal mini-flow line (RHR would have to be shutdown to do this), which could degrade the RHR pumps if an event caused reduced pump flow. Additionally during testing of these five valves, the normal safety injection pump suction would be isolated (32 safety injection pump would have an alternate suction), and the residual heat removal system sampling capability would be isolated.

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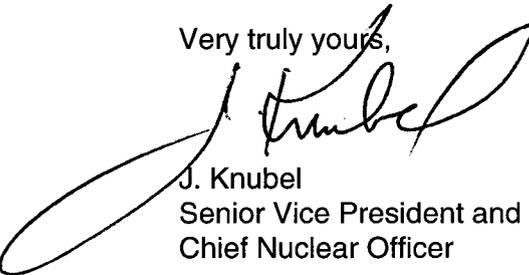
Attachment I to this application contains the request for an emergency Technical Specification change, including the signed original of the Application for Amendment to the Operating License, the proposed change to the Technical Specifications and the associated Safety Evaluation in accordance with 10CFR50.91 requirements. Also included with Attachment I, for information only, is a markup of the Technical Specification to show the proposed changes. As stated, these requests are for a one-time use only.

The Power Authority respectfully requests that the proposed Technical Specification change be processed on an expedited basis (per 10CFR50.91(a)(5)). Failure to do so (i.e., by providing the normal 30-day public comment period) will result in a delayed resumption of plant operation at power. The Technical Specification change request in Attachment I describes the circumstances surrounding this request, including how this request satisfies the emergency change criteria, and that the situation could not have been avoided.

A copy of this letter with the attachment containing the application, proposed changes, safety evaluation and marked up Technical Specification pages is being provided to the designated New York State official as required by 10 CFR 50.91.

This submittal 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

Attachment: As stated

cc: next page

cc: Regional Administrator
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ATTACHMENT I TO IPN-98-127

Emergency Technical Specification Change Request

Associated With

Leakage Testing of Seven Containment Isolation Valves With Water

Applies to the following valves:

AC-732
AC-MOV-743
AC-MOV-744
SI-MOV-888A
SI-MOV-888B
AC-AOV-958
AC-MOV-1870

This attachment contains the following four parts:

1. Application for Amendment to the Operating License
2. Proposed Revised Technical Specification Pages
3. Safety Evaluation for the Proposed Changes
4. Markup of Existing Technical Specifications (for Information Only)