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James Knubel Senior Vice President and Chief Nuclear Officer

December 11, 1998 IPN-98-134

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, DC 20555-0001

Subject:

Indian Point 3 Nuclear Power Plant

Docket No. 50-286

Proposed Technical Specification Change (License Amendment) Conversion to Improved Standard Technical Specifications

References:

- 1) NUREG-1431, "Standard Technical Specifications-Westinghouse Plants," Revision 1, dated April 1995.
- 2) NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996.

Dear Sir:

Pursuant to 10 CFR 50.90, the New York Power Authority hereby proposes to amend the Indian Point 3 Plant Operating License, Appendices A and B, Technical Specifications (TS) to convert the Indian Point 3 current Technical Specifications (CTS) to be consistent with the Improved Standard Technical Specifications (ISTS) (Reference 1).

The proposed license amendment request to convert the Indian Point 3 CTS to the Indian Point 3 Improved Technical Specifications (ITS) is enclosed with this letter. The proposed license amendment request was prepared consistent with guidance provided in Nuclear Energy Institute (NEI) NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996 (Reference 2).

The submittal for the conversion of the Indian Point 3 CTS to the Indian Point 3 ITS consists of six (6) sections collected into 20 volumes. The 6 sections of the conversion submittal are as follows:

1. Application of NRC Selection Criteria including the CTS to ITS Disposition and Relocation Matrix (Split Report):

11. Relocated Requirements - Descriptions and Justifications for the relocation of selected IP3 current Technical Specifications:

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NYPA intends to implement this proposed license amendment request at Indian Point 3 in June 2000. This date is based on the time required for procedure revisions, including the development of new programs and training. In addition, this date considers the timing of implementation with respect to planned refueling outages and the scheduling of an initial licensed operator examination in October 1999. This date is also predicated on the NRC review being completed and a Safety Evaluation issued by March 2000.

A meeting has been scheduled on December 15, 1998 to discuss the review schedule and contents of this license amendment request. There are no new commitments contained in this submittal. Should you have any questions or require additional information, please contact the Indian Point 3 ITS Project Manager, Mr. George Wilverding at (914)788-2054.

Very truly yours,

 Knubel Senior Vice President and Chief Nuclear Officer

Attachments

CC:

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