

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of)

POWER AUTHORITY OF THE STATE OF NEW YORK)

Docket No. 50 - 286

Indian Point 3 Nuclear Power Plant)

APPLICATION FOR AMENDMENT TO THE OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, the Power Authority of the State of New York, as holder of Facility Operating License No. DPR-64, hereby applies for an amendment to the Technical Specifications contained in Appendices A and B of this license.

This application for amendment to the Indian Point 3 Technical Specifications proposes to convert the Indian Point 3 current Technical Specifications (CTS) to be consistent with the Improved Standard Technical Specifications (ISTS) in NUREG-1431, Revision 1, dated April 1995. The proposed license amendment request was prepared considering the guidance of Nuclear Energy Institute (NEI) NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996.

The proposed licence amendment request to convert the Indian Point 3 CTS to the Indian Point 3 Improved Technical Specification (ITS) is enclosed with this application.

POWER AUTHORITY OF THE
STATE OF NEW YORK

By

J. Knubel

Senior Vice President and
Chief Nuclear Officer

STATE OF NEW YORK
COUNTY OF WESTCHESTER

Subscribed and Sworn to before me
this 11th day of December 1998

Eileen E. O'Connor
Notary Public

EILEEN E. O'CONNOR
Notary Public, State of New York
No. 4591062
Qualified in Westchester County
Commission Expires January 21, 2000

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ATTACHMENT 1 to IPN-98-134

**Synopsis of the License Amendment Request
for Conversion to Improved Technical Specifications (ITS)**

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

The submittal for the conversion of the IP3 current Technical Specifications (CTS) to the IP3 Improved Technical Specifications (ITS) consists of six (6) sections collected into 20 volumes. The 6 sections of the conversion submittal are as follows:

- I. Application of NRC Selection Criteria including the CTS to ITS Disposition and Relocation Matrix (Split Report);
- II. Relocated Requirements - Descriptions and Justifications for the relocation of selected IP3 current Technical Specifications (CTS);
- III. IP3 Conversion Packages - Descriptions and Justifications for the conversion of IP3 current Technical Specifications (CTS) to IP3 Improved Technical Specifications;
- IV. Evaluations supporting a finding of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for proposed changes classified as Administrative (A), More Restrictive (M), Removed Detail (LA) or Relocated (R) (Note that NSHCs for changes classified as Less Restrictive (L) are included in Section III);
- V. IP3 CTS Master Markup; and
- VI. IP3 ITS Specifications and ITS Bases.

A detailed description of each of these 6 sections is as follows:

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

Section I is an explanation of the process and a summary of the results of the application of the 10 CFR 50.36(c)(2)(ii) criteria for which requirements must be classified as Technical Specifications. The "NRC Selection Criteria" document provides a discussion of how the criteria of 10 CFR 50.36(c)(2)(ii) were applied to the Indian Point 3 CTS requirements. The "ITS Disposition and Relocation Matrix" (Split Report) presents a summary of the results of this process by listing each CTS specification and whether or not the CTS specification is retained in the IP3 ITS. If retained in the IP3 ITS, the matrix identifies the new ITS specification number, the criterion of 10 CFR 50.36(c)(2)(ii) that applies and the basis for inclusion of the requirement in the Improved Technical Specifications. If not retained in the IP3 ITS, the matrix identifies the Section II subsection that provides the detailed justification for relocation and the proposed new location for relocated requirements.

Section II. Descriptions and Justifications for the relocation of selected IP3 current Technical Specifications (CTS)

Section II consists of 20 subsections (which are listed in Attachment 2), one for each of the CTS requirements that do not meet any of the 10 CFR 50.36(c)(2)(ii) criteria for inclusion in the Technical Specifications. Each of the 20 subsections consists of 2 parts as follows:

Part 1 includes the associated current Technical Specification pages that have been annotated to show the relocated CTS requirement. The cover page for Part 2 identifies the effective amendment for each CTS page and any docketed Technical Specific Change Request (TSCR) that is not yet approved. All unapproved TSCRs docketed as of November 1, 1998 are incorporated into the ITS conversion package. TSCRs are listed in Attachment 3.

Part 2 is the justification for relocation of the CTS requirement to a document controlled by the New York Power Authority in accordance with 10 CFR 50.59 or 10 CFR 50.54(a). The justification for relocation consists of an evaluation of the CTS requirement against each of 4 criteria in 10 CFR 50.36(c)(2)(ii) and a determination that the relocated requirement has not been previously evaluated as risk significant in the IP3 Individual Plant Examination (IPE). This section also identifies the proposed new location for the CTS requirement with a discussion of how this location ensures an appropriate change control process and an appropriate level of regulatory oversight are maintained for the requirement being relocated out of the Technical Specifications.

Section III. Descriptions and Justifications for the conversion of IP3 current Technical Specifications (CTS) to IP3 Improved Technical Specifications

Section III consists of 107 subsections (which are listed in Attachment 2), one for each of the proposed IP3 Improved Technical Specifications. To facilitate both the NYPA and NRC review, each subsection contains the information necessary for review of one proposed IP3 Specification. Each of the 107 subsections is divided into 6 parts as follows:

Part 1 is a typed final copy of the proposed IP3 Improved Technical Specification including the associated Bases.

Part 2 consists of the current Technical Specification pages annotated to show the differences between the CTS and the IP3 Improved Technical Specification (CTS Markup). These "CTS Markups" also provide a cross reference to the equivalent ITS requirement in both Part 1 and Part 5 of the subsection. Where a proposed ITS requirement differs from a CTS requirement, individual details of the CTS revision are annotated with alphanumeric designators which relate to the appropriate Discussion of Change (DOC) which is included in Part 3 of the subsection. The alphanumeric designators also relate to the evaluations supporting a finding of No Significant Hazards Consideration (NSHC) which is included in Part 4 of the subsection. The cover page for Part 2 identifies the effective amendment for

each CTS page and any docketed Technical Specific Change Request (TSCR) that is not yet approved. All unapproved TSCRs docketed as of November 1, 1998 are incorporated into the ITS conversion package. TSCRs are listed in Attachment 3.

Part 3 consists of a Discussion of Change (DOC) for each of the differences between the CTS and the proposed ITS. The changes are listed by the alphanumeric designators which provide a cross reference to the CTS Markup contained in Part 2, the NSHC contained in Part 4, and the ITS Markup contained in Part 5. Each DOC includes a reference to and description of both the CTS and ITS requirements being discussed, the reason the change is needed, and a detailed justification that the proposed change does not result in a significant safety hazard.

Each of the changes between the CTS and the ITS is classified into one of the following categories:

Administrative Changes (with a designator A.n) are changes to the CTS that do not result in new requirements or change operational restrictions or flexibility. These changes are supported in aggregate by a single NSHC contained in Section IV.

More Restrictive Changes (with a designator M.n) are changes to the CTS that establish a new requirement, require new or more frequent testing, or reduce operational flexibility. These changes are supported in aggregate by a single NSHC contained in Section IV.

Less Restrictive Changes (with a designator L.n) are changes to the CTS that eliminate existing requirements, require less or less frequent testing, or increase operational flexibility. These changes are supported by a change specific NSHC contained in Part 4 of each subsection.

Less Restrictive Administrative Changes (with a designator LA.n) are changes to the CTS that relocate details out of the CTS and into the Bases, FSAR, or other appropriate licensee-controlled document. These are administrative changes because there is no change to the CTS requirement, it is simply relocated to a licensee-controlled document. These are less restrictive changes because the relocation results in a less restrictive change control process and a reduced level of regulatory oversight. These changes are supported in aggregate by a single NSHC contained in Section IV.

Part 4 consists of the NYPA evaluations supporting a finding of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for proposed changes classified as Less Restrictive.

Part 5 consists of a copy of NUREG-1431, Revision 1, annotated to show differences between the NUREG-1431 and the proposed IP3 ITS. These ITS markups include cross references to the descriptions and justifications of the changes included in Part 3 and cross

references to the equivalent IP3 CTS in Part 2. Cross references to the Justification of Differences between NUREG-1431 and IP3 ITS contained in Part 6 are annotated. The cover page for Part 5 identifies associated "ISTS Change Travelers" and their approval status as of August 1998. With one exception, only approved ISTS Change Travelers have been incorporated.

Part 6 includes the Justification for Differences (JDs) between NUREG-1431 and the IP3 ITS. Differences between the IP3 ITS and NUREG-1431, Revision 1, were made for any of the following reasons:

Existing requirements (Current Licensing Basis) are maintained where a demonstrated need exists and the CTS requirement was previously justified and approved. Each of these changes was evaluated to ensure that the need still exists and that maintaining the CLB does not result in a significant adverse impact on safety.

Plant-specific Wording Preferences or Minor Editorial Improvements were incorporated into the Bases to improve clarity, or ensure requirements are fully understood and consistently applied by the NYPA staff.

Plant-specific difference in the design or design basis were incorporated as necessary to more precisely describe IP3 current design or practice.

Differences based on an approved Generic Change Traveler for NUREG-1431 were incorporated. The cover page for Part 5 identifies associated "ISTS Change Travelers" and their approval status as of August 1998. With one exception, only approved ISTS Change Travelers have been incorporated.

Section IV. Evaluations supporting a finding of No Significant Hazards Consideration (NSHC) changes classified as Administrative, More Restrictive, Removed Detail or Relocated.

Section IV consists of the NYPA evaluations supporting a finding of No Significant Hazards Consideration (NSHC) as required by 10 CFR 50.91(a) for proposed changes classified as Administrative, More Restrictive, Removed Detail or Relocated. Section IV also contains the environmental assessment in accordance with 10 CFR 51.21.

Section V. IP3 CTS Master Markup

Section V is a copy of all of the CTS pages that were annotated to show differences between CTS and ITS for the 127 subsections in Sections II (20) and III (107). The CTS Markups from each of the 127 subsections in Sections II and III are presented in the order of the ITS. The compilation volume provides an entire markup of the CTS in CTS order to facilitate NRC review efforts and to demonstrate that all CTS requirements are accounted for. In many instances, the same CTS page is used in different ITS sections. As a result, in the compilation volume, the

CTS pages that are included in more than one ITS Specification package will appear with the annotations associated with each ITS Specification package in which the CTS page appears. A CTS Master Markup table of contents is provided.

Section VI. IP3 ITS Specifications and ITS Bases

Section VI is a copy of the Indian Point 3 ITS Specifications and ITS Bases presented in their complete form to facilitate the review of the document in an integrated manner.

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The six sections, discussed previously, are contained in 20 volumes. A table of contents for these volumes is provided below.

<u>VOLUME #</u>	<u>SECTION #</u>	<u>TITLE</u>
1	I	SPLIT REPORT
	II	RELOCATED ITEMS
2	III	ITS 1.0, 2.0, 3.0
3	III	ITS 3.1
4	III	ITS 3.3.1, 3.3.2
6	III	ITS 3.3.3 - 3.3.8
7	III	ITS 3.4.1 - 3.4.10
8	III	ITS 3.4.11 - 3.4.16
9	III	ITS 3.5
10	III	ITS 3.6
11	III	ITS 3.7.1 - 3.7.8
12	III	ITS 3.7.9 - 3.7.17
13	III	ITS 3.8
14	III	ITS 3.9
15	III	ITS 4.0, 5.0
	IV	GENERIC NSHC
16	V	CTS MASTER MARKUP LIC., 1.0 - 3.14
17	V	CTS MASTER MARKUP 4.1 - 6.14, ETS
18	VI	IP3 ITS SPECIFICATIONS
19	VI	IP3 ITS BASES 1.0 - 3.4
20	VI	IP3 ITS BASES 3.5 - 5.15

ATTACHMENT 2 to IPN-98-134

List of the IP3 ITS Conversion Packages

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
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3.1	REACTIVITY CONTROL SYSTEMS
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3.1.2	Core Reactivity
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3.4.3	RCS Pressure and Temperature (P/T) Limits
3.4.4	RCS Loops—MODES 1 and 2
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IP3 Relocated CTS Specifications:

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- R.2 Steam Generator Secondary Side Minimum Temperature For Pressurization
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- R.4 Maximum Reactor Coolant Oxygen, Chloride And Fluoride Concentration
- R.5 Chemical And Volume Control System
- R.6 Weld Channel and Penetration Pressurization System (WC & PPS)
- R.7 Steam And Power Conversion System (Turbine Generator)
- R.8 Area Radiation Monitoring and Plant Effluent Radioiodine/particulate Sampling
- R.9 Auxiliary Electrical Systems (A.C. Circuits Inside Containment)
- R.10 Refueling, Fuel Handling and Storage (Communications)
- R.11 Refueling, Fuel Handling and Storage (Decay Time)
- R.12 Refueling (Manipulator Cranes and Spent Fuel Cask)
- R.13 Service Water Isolation Valve Leakage (0.36 GPM Leakage Limit)
- R.14 Radioactive Materials Management
- R.15 Movable Incore Instrumentation
- R.16 River Level (Flooding Protection)
- R.17 Safety-related Shock Suppressors (Snubbers)
- R.18 Toxic Gas Monitoring
- R.19 Reactor Coolant System Integrity Testing
- R.20 Seismic Instrumentation

ATTACHMENT 3 to IPN-98-134

**List of the Docketed
IP3 Technical Specification Change Requests (TSCRs)**

**NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64**

List of the Docketed IP3 Technical Specification Change Requests (TSCRs)

TAC Number	NYPAs TSCR Number	TSCR Name
M96030	IPN-96-063	Leakage Limits for RCS and SIS
M96620	IPN-96-101	Deleted PORC Review of Fire Protection Procedure
M97673	IPN-96-124	AOT for ESF Initiation Instrumentation
M99231	IPN-97-051	SRC Audit Requirements and Management Title Changes
M99028	IPN-97-070	Clarification of Containment Integrity
MA1120	IPN-98-018	Generic Letter 89-01 and 10 CFR 20 Generic Letter
MA1641	IPN-98-043	Instrument SR Intervals Extended to 24 Months
MA1640	IPN-98-044	DG Testing when a DG is Inoperable
MA3943	IPN-98-113	Relocate CVCS Specification