

123 Main Street
White Plains, New York 10601
914 681.6950
914 287.3309 (Fax)



James Knubel
Senior Vice President and
Chief Nuclear Officer

December 15, 1998
IPN-98-139

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:

Due to an administrative oversight, this cover letter is being resubmitted. It supersedes the cover letter for IPN-98-134, dated December 11, 1998. Attachments 1 through 3 and the 20 volumes of supplemental material submitted with IPN-98-134 are still valid.

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:

- I. Application of NRC Selection Criteria including the CTS to ITS Disposition and Relocation Matrix (Split Report);

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- II. Relocated Requirements - Descriptions and Justifications for the relocation of selected IP3 current Technical Specifications;
- III. IP3 Conversion Packages - Descriptions and Justifications for the conversion of IP3 current Technical Specifications 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.

Attachment 1 of this letter, "Synopsis of the License Amendment Request For Conversion to Improved Technical Specifications (ITS)," provides a detailed description of the organization and contents of each Section.

To facilitate your review, Section II, Relocated Requirements, and Section III, IP3 Conversion Packages, are divided into twenty (20) subsections and one hundred and seven (107) subsections, respectively. Each subsection is designed to allow it to be reviewed independently. Attachment 2 of this letter is a list of these subsections.

Attachment 3, "Pending License Amendment Requests," provides a listing of all currently docketed license amendment requests. These amendment requests are incorporated into the conversion package. Each conversion package clearly identifies where pending license amendment requests are used as the starting point for the conversion to ITS. The Authority requests continuing processing of these line item changes in parallel with this submittal. During the period of NRC review of the Indian Point 3 ITS, supplemental submittals incorporating pending changes to the CTS will be made where necessary. These supplements will be coordinated with the NRC staff reviewers to ensure that the ITS and CTS review processes are efficiently coordinated.

Improved Standard Technical Specification (ISTS) Change Travelers (i.e., generic changes to Reference 1) and their approval status are identified on the cover page of each of the IP3 Conversion Packages in Section III. Only ISTS Change Travelers approved by the NRC as of August 1998 are incorporated with one exception (TSTF-135, Revision 2 (Technical Specification Task Force), "RPS and ESFAS Instrumentation") which was made in anticipation of imminent NRC approval.

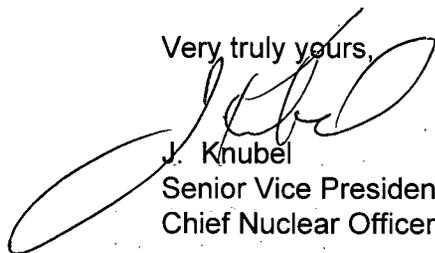
NYP&A has endeavored to limit the Technical Specification changes to those required to establish conformance with the ISTS. However, in several cases, the IP3 design does not allow the adoption of the ISTS. In these cases, changes were made to the current licensing basis which are beyond the scope of the conversion to ISTS. These beyond scope changes are made only in cases where specific criteria discussed in Attachment 1, Section III are met. The IP3 Conversion Packages provide sufficient detail to demonstrate the need for these changes and to support prompt review and approval.

Implementation of the Indian Point 3 ITS will require the performance of a number of new surveillance requirements. NYPA intends to treat these new requirements as being "met" at the time of implementation, with the first performance of these new surveillance requirements scheduled to be completed within the required frequency from the date of implementation.

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,



J. Knubel
Senior Vice President and
Chief Nuclear Officer

Attachments

cc: Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U. S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

Mr. F. William Valentino, President
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. George Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
U. S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, DC 20555

Mr. William D. Beckner, Chief
Technical Specifications Branch
U. S. Nuclear Regulatory Commission
Mail Stop 13H15
Washington, DC 20555