ATTACHMENT I TO IPN-99-007

PROPOSED TECHNICAL SPECIFICATION CHANGES

REGARDING TIME RESTRICTION FOR MOVEMENT OF IRRADIATED FUEL

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

8. The Containment Building Vent and Purge System, including the radiation monitors which initiate isolation, shall be tested and verified to be operable within 100 hours prior to refueling operations.

9. No movement of irradiated fuel in the reactor shall be made until the reactor has been subcritical for at least 145 hours. In addition, movement of fuel in the reactor before the reactor has been subcritical for equal to or greater than 421* hours will necessitate operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal absorbers. For this case operability of the Containment Building Vent and Purge System shall be established in accordance with Section 4.13 of the Technical Specifications.

10. Whenever movement of irradiated fuel is being made, the minimum water level in the area of movement shall be maintained 23 feet over the top of the reactor pressure vessel flange.

11. Hoists or cranes utilized in handling irradiated fuel shall be dead load tested before movement begins. The load assumed by the hoists or cranes for this test must be equal to or greater than the maximum load to be assumed by the hoists or cranes during the refueling operation. A thorough visual inspection of the hoists or cranes shall be made after the dead load test and prior to fuel handling. A test of interlocks and overload cutoff devices on the manipulator shall also be performed.

12. The fuel storage building emergency ventilation system shall be operable whenever irradiated fuel is being handled within the fuel storage building. The emergency ventilation system may be inoperable when irradiated fuel is in the fuel storage building, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are moved over the spent fuel pit during the period of inoperability.

13. To ensure redundant decay heat removal capability, at least two of the following requirements shall be met:

* Movement of irradiated VANTAGE + fuel assemblies before the reactor has been subcritical for ≥550 hours requires operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers.

Amendment No. 13, 30, 34, 53, 69, 72, 90, 173, 175,

The requirement for the fuel storage building emergency ventilation system to be operable is established in accordance with standard testing requirements to ensure that the system will function to reduce the offsite dose to within acceptable limits in the event of a fuel handling accident. The fuel storage building emergency ventilation system must be operable whenever irradiated fuel is being moved. However, if the irradiated fuel has had a continuous 45 day decay period, the fuel storage building emergency ventilation system is not technically necessary, even though the system is required to be operable during all fuel handling operations. Fuel Storage Building isolation is actuated upon receipt of a signal from the area high activity alarm or by manual operation. The emergency ventilation bypass assembly is manually isolated, using manual isolation devices, prior to movement of any irradiated fuel. This ensures that all air flow is directed through the emergency ventilation HEPA filters and charcoal adsorbers. The ventilation system is tested prior to all fuel handling activities to ensure the proper operation of the filtration system.

When fuel in the reactor is moved before the reactor has been subcritical for at least 421 hours (See footnote on page 3.8-2), the limitations on the Containment Building Vent and Purge System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorbers prior to discharge to the atmosphere.

The limit to have at least two means of decay heat removal operable ensures that a single failure of the operating RHR System will not result in a total loss of decay heat removal capability. With the reactor head removed and 23 feet of water above the vessel flange, a large heat sink is available for core cooling. Thus, in the event of a single component failure, adequate time is provided to initiate diverse methods to cool the core.

The minimum spent fuel pit boron concentration and the restriction of the movement of the spent fuel cask over irradiated fuel were specified in order to minimize the consequences of an unlikely sideways cask drop.

As shown in Figure 3.8-3, the maximum density spent fuel storage racks consist of two regions: Region 1 (Columns SS-ZZ, Rows 35-64) and Region 2 (Columns A-RR, Rows 1-34). Each region has been separately analyzed for close packed storage, where all cells in that region contain fuel of the highest allowable reactivity.

The Region 1 area has also been analyzed for storage of high-enrichment and low-burnup fuel. Figure 3.8-1 categorizes Region 1 fuel assemblies as a function of their initial enrichment and current burnup into Types A, B, and C. Each type has different restrictions as to how it may be stored in Region 1. The least reactive assemblies, which are Type A assemblies, may be stored anywhere in Region 1. The most reactive assemblies, which are Type C assemblies, are stored only in Region 1 with the restrictions of Technical Specification 3.8.C.7.b.3, due to their high reactivity. Type C assemblies cannot be stored face-adjacent to anything more reactive than Type A fuel assemblies. There are no additional restrictions defining storage requirements for diagonally-adjacent fuel assemblies in Region 1. In addition, to prevent a criticality interaction with Region 2 fuel assemblies, Type C assemblies cannot be stored in Column ZZ or Row 64.

The following criteria should be used to categorize Region 1 fuel assemblies. Unburned fuel assemblies at or below 4.2 w/o enrichment are Type A. Unburned fuel assemblies at or below 4.6 w/o enrichment (but greater than 4.2 w/o enrichment) are Type B. Fuel assemblies whose burnup puts them on or above the diagonal line below the Type A zone are defined as Type A.

Fuel assemblies to be stored in Region 2 of the spent fuel racks must have a minimum burnup exposure as a function of initial enrichment as specified in Figure 3.8-2. Administrative controls will provide verification that each fuel assembly to be placed in Region 2 satisfies the burnup criterion.

Mechanical stops incorporated on the bridge rails of the fuel storage building crane make it impossible for the bridge of the crane to travel further north than a point directly over the spot in the spent fuel pit that is reserved for the spent fuel cask. Therefore, it will be impossible to carry any object over the spent fuel storage areas north of the spot in the pit that is reserved for the cask with either the 40 or 5-ton hook of the fuel storage building crane. It is possible to use the fuel storage building crane to carry objects over the spent fuel storage areas that are directly east of the spot in the pit that is reserved for the cask. However, the technical specifications and plant procedures prevent any object weighing more than 2,000 pounds from being moved over any region of the spent fuel pit. Therefore, the storage areas directly east of the spot in the pit that is reserved for the cask are protected from heavy load handling by administrative controls.

Dead load tests and visual inspection of the hoists and cranes before handling irradiated fuel provide assurance that the hoists or cranes are capable of proper operation.

References

(1) FSAR - Section 9.5.2

ATTACHMENT II TO IPN-99-007

SAFETY EVALUATION OF PROPOSED TECHNICAL SPECIFICATION RELOCATION REGARDING TIME RESTRICTION FOR MOVEMENT OF IRRADIATED FUEL

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

Section I - Description of Changes

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to relocate (i.e., remove from TS) a time restriction for movement of irradiated fuel of TS 3.8.A.9, and its basis, to a licensee controlled document that is controlled in accordance with the provisions of 10 CFR 50.59. The proposed change relocates to the FSAR the TS 3.8.A.9 statement that, "In the event that more than 76 assemblies are to be discharged from the reactor, those assemblies in excess of 76 shall not be discharged earlier than 267 hours after shutdown." The proposed change also relocates to the FSAR the TS 3.8.A.9 basis that "The waiting time of 267 hours required following plant shutdown before unloading more than 76 assemblies from the reactor ensures that the maximum spent fuel pool (SFP) water temperature will be within design objectives as stated in the FSAR. The calculations confirming this are based on an inlet river temperature of 95°F, consistent with the FSAR assumptions."

Section II - Evaluation of Changes

NYPA proposes to relocate a time restriction for movement of irradiated fuel specified in TS 3.8.A.9. The restriction is to ensure that the maximum SFP water temperature will be within design objectives as stated in the FSAR. This TS relocation is being proposed since NYPA has not yet implemented the improved TS. An Improved Technical Specification conversion transmittal was submitted to the NRC by letter dated December 11, 1998 (IPN-98-134). The improved TS do not contain the irradiated fuel movement time restriction of TS 3.8. NYPA is proposing no changes to the TS (other than relocation) for review and approval by the NRC. Following NRC approval of the TS change, revision of the relocated time constraint will be controlled in accordance with the provisions of 10 CFR 50.59. The TS 3.8.A.9 for 267 hours prior to discharging more than 76 fuel assemblies from the reactor is based on assumptions that result in a maximum SFP heat load of 35E6 BTU/hour. The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor ensures that the maximum pool water temperature will be within design objectives as stated in the FSAR.

The NRC developed four criteria for determining when a TS was required. These criteria were incorporated into 10 CFR 50.36(c)(2)(ii) as part of the TS improvement effort. The NRC policy statement (Reference 1) related to this revision acknowledged that implementation of the criteria might cause requirements of the TS to be relocated. The irradiated fuel movement time restriction of TS 3.8.A.9 may be relocated because it does not meet the requirements of 10 CFR 50.36(c)(2)(ii) which define when TS are required. For this reason, the current STS (Reference 2) no longer contain irradiated fuel movement time restriction TS. A review of the provisions of 10 CFR 50.36(c)(2)(ii) with respect to Indian Point 3 confirm that the irradiated fuel movement time restriction TS may be relocated. That review shows the following relative to the four criteria for needing a TS:

- The first criterion is for instrumentation used to detect significant reactor coolant pressure boundary (RCPB) degradation. The TS being relocated concerns time limits for fuel movement, not any instrumentation used to detect significant RCPB degradation.

Section II - Evaluation of Changes (cont'd)

The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is a restriction that ensures that the maximum pool water temperature will be within design objectives as stated in the FSAR. The waiting time of 267 hours prior to movement of additional irradiated fuel is not an assumption used in the dose calculation for the fuel handling accident (FHA). Not permitting movement of irradiated fuel for a specified period following shutdown is not used for detecting a significant abnormal degradation of the RCPB prior to a design basis accident (DBA). Therefore, an irradiated fuel movement time restriction TS is not required by the first criterion.

- The second criterion is for process variables, design features or operating restrictions that are an initial condition of a DBA or transient that assumes the failure of or presents a challenge to the integrity of a fission product barrier.

  The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is not a process variable, design feature or operating restriction assumption that is an initial condition of a DBA or transient (i.e., not used in the FHA analysis). The FHA is a postulated event that involves damage to irradiated fuel. The release of radioactivity from the containment following a FHA is limited by other TS requirements; 1) the requirement of a minimum water level above the fuel during refueling to ensure sufficient water to retain activity, 2) the requirement to test and verify that the containment vent and purge system (CV&PS) is operable prior to refueling operations, 3) the requirement that the CV&PS is operable and aligned to discharge through the HEPA filters and charcoal absorbers for a specified minimum number of hours following reactor shutdown, 4) the requirement to have containment penetrations having direct access to the atmosphere isolated and the CV&PS capable of being closed by operable isolation instrumentation. The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor ensures that the maximum SFP water temperature will be within design objectives as stated in the FSAR. Therefore, an irradiated fuel movement time restriction TS is not required by the second criterion.

- The third criterion is for structures, systems and components that are part of the primary success path and which functions or actuates to mitigate a design basis event (DBE) that assumes the failure of or presents a challenge to the integrity of a fission product barrier.

  Not permitting movement of irradiated fuel for a specified period following shutdown is not a primary success path in the mitigation of a DBE or transient. The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is to ensure that the maximum pool water temperature will be within design objectives as stated in the FSAR. SFP cooling is not a part of the primary success path nor functions or actuates to mitigate a DBE that assumes the failure of or presents a challenge to the integrity of a fission product barrier. Therefore, an irradiated fuel movement time restriction TS is not required by the third criterion.

Section II - Evaluation of Changes (cont'd)

- The last criterion is for structures, systems and components that operating experience or probabalistic risk analysis has shown to be significant to public health and safety. The NRC guidance in SECY 95-128 "Final Rulemaking Package for 10 CFR 50.36, "Technical Specifications"," dated May 19, 1995 indicates that PRA insights should be utilized to indicate "whether the provisions to be relocated contain constraints of importance in limiting the likelihood or severity of the accident sequences that are commonly found to dominate risk."

  The IP3 individual plant examination (IPE) (Reference 3) did not model the FHA. The probability of a fuel handling incident is low because of administrative controls and physical limitations imposed on fuel handling operations. The constraint (267 hours) in the relocated TS is not important to "limiting the likelihood" of a FHA because the waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is to ensure that the maximum pool water temperature will be within design objectives as stated in the FSAR. The waiting time of 267 hours is not the initiator of an accident and the proposed change does not alter overall system operation, physical design, system configuration, or operational setpoints. The relocated requirement will still be under the control of the 10 CFR 50.59 process, which will assure that no unreviewed safety question exist prior to any changes in these requirements.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously analyzed?

Response:

Relocation (i.e., removal from TS) of TS 3.8.A.9 and its basis for the minimum time prior to movement of more than 76 irradiated fuel assemblies (267 hour limit) will not involve a significant increase in the probability or consequences of an accident since the relocation of the TS to administrative controls governed by 10 CFR 50.59 (FSAR) does not affect the availability or function of fuel storage and handling equipment or the SFP cooling system. The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is to ensure that the maximum SFP water temperature will be within design objectives as stated in the FSAR.

The waiting time of 267 hours is not an initiator of an accident and the proposed change does not alter overall system operation, physical design, system configuration, or operational setpoints. There will be no significant increase in the consequences of an accident because the restricted movement time for irradiated fuel will continue to be administratively controlled under 10 CFR 50.59.

Section III - No Significant Hazards Evaluation (cont'd)

The other TS of section 3.8.A (such as the remaining portion of 3.8.A.9, and 3.8.A.10) and the other controls ensure that doses from a postulated FHA are within 10 CFR 100 limits.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response:

The basis for the waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is to ensure that the maximum pool water temperature will be within design objectives as stated in the FSAR. Relocation of this waiting time of 267 hours for irradiated fuel will not create the possibility of a new or different kind of accident from any previously evaluated. The TS change will not create the possibility of a new or different kind of accident from any previously evaluated since it does not alter the administrative controls for fuel handling or the operation, physical design, system configuration, or operational setpoints for fuel handling and SFP cooling. The plant systems for fuel storage and handling, and SFP cooling are operated in the same manner as before and, consequently, the relocation does not introduce any new accident initiators or failure mechanisms and does not invalidate the existing FHA response. The minimum waiting time for movement of more than 76 irradiated fuel assemblies is not an accident initiator. The minimum waiting time will continue to be controlled under 10 CFR 50.59.

(3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

Relocation (i.e., removal from TS) of TS 3.8.A.9 and its basis for the waiting time of 267 hours following plant shutdown for irradiated fuel will not involve a significant reduction in margin of safety. The waiting time of 267 hours following plant shutdown before unloading more than 76 assemblies from the reactor is to ensure that the maximum SFP water temperature will be within design objectives as stated in the FSAR. The relocation is a change to the administrative controls that are used to limit the heat load on the SFP cooling system, and those administrative controls will be governed by 10 CFR 50.59. The manner in which fuel storage and handling is performed, and how the SFP cooling system is operated does not change and there is no change to physical design, system configuration, or operational setpoints. The other controls and the existing TS assure that dose from a postulated FHA are within 10 CFR 100 limits. Previous analyses remain unchanged. The current TS does not meet the criteria in 10 CFR 50.36(c)(2)(ii) for inclusion in the Technical Specifications.

Section IV - Effect of Changes

The proposed relocation does not adversely affect fuel storage and handling or the operation or testing of the SFP system and no modifications will be required. Administrative controls ensure that doses are limited in accordance with the ALARA Program. Therefore, there will be no adverse effect on the control of radiation exposure or the program.

There would be no adverse effect on the Security and Fire Protection Programs because there are no physical changes, and fuel handling, fuel storage and SFP cooling design and operation remain the same. The time limit for irradiated fuel movement will not change the security system capability or operation, nor combustible loads or Appendix R requirements. There would be no adverse effect on the Emergency Plan since fuel handling and SFP cooling system operation will not be changed and the postulated accident remains the same.

Plant response to a FHA will remain the same. FSAR changes are subject to 10 CFR 50.59. A review of the FSAR and SER conclusions identified no information that will be inconsistent with the proposed changes. The FSAR will be revised to reflect the relocated portion of TS 3.8.A.9 and basis. There will be no effect on overall plant operations and the environment since fuel handling, fuel storage, and SFP cooling system operation will remain the same and there will be no changes to plant effluents or radwaste.

Section V - Conclusions

The relocation of the TS time constraint for movement of irradiated fuel will not involve a significant hazard since the relocation :

a) will not significantly increase the probability nor the consequences of an accident previously evaluated;

b) will not create the possibility of a new or different kind of accident than previously evaluated; and,

c) will not significantly reduce the margin of safety.

Section VI - References

1. NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," dated July 22, 1993.

2. NUREG 1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, dated April 1995.

3. IP3-RPT-MULT-01539, Rev. 0, "Indian Point Three Nuclear Power Plant Individual Plant Examination," dated June 1994.

ATTACHMENT III TO IPN-99-007

MARKUP OF EXISTING TECHNICAL SPECIFICATION TO SHOW PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING TIME RESTRICTION FOR MOVEMENT OF IRRADIATED FUEL

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8. The Containment Building Vent and Purge System, including the radiation monitors which initiate isolation, shall be tested and verified to be operable within 100 hours prior to refueling operations.

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12. The fuel storage building emergency ventilation system shall be operable whenever irradiated fuel is being handled within the fuel storage building. The emergency ventilation system may be inoperable when irradiated fuel is in the fuel storage building, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are moved over the spent fuel pit during the period of inoperability.

13. To ensure redundant decay heat removal capability, at least two of the following requirements shall be met:

* Movement of irradiated VANTAGE + fuel assemblies before the reactor has been subcritical for ≥550 hours requires operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers.

~~The waiting time of 267 hours required following plant shutdown before unloading more than 76 assemblies from the reactor ensures that the maximum pool water temperature will be within design objectives as stated in the FSAR. The calculations confirming this are based on an inlet river temperature of 95°F, consistent with FSAR assumptions[T27].~~

The requirement for the fuel storage building emergency ventilation system to be operable is established in accordance with standard testing requirements to ensure that the system will function to reduce the offsite dose to within acceptable limits in the event of a fuel handling accident. The fuel storage building emergency ventilation system must be operable whenever irradiated fuel is being moved. However, if the irradiated fuel has had a continuous 45 day decay period, the fuel storage building emergency ventilation system is not technically necessary, even though the system is required to be operable during all fuel handling operations. Fuel Storage Building isolation is actuated upon receipt of a signal from the area high activity alarm or by manual operation. The emergency ventilation bypass assembly is manually isolated, using manual isolation devices, prior to movement of any irradiated fuel. This ensures that all air flow is directed through the emergency ventilation HEPA filters and charcoal adsorbers. The ventilation system is tested prior to all fuel handling activities to ensure the proper operation of the filtration system.

When fuel in the reactor is moved before the reactor has been subcritical for at least 421 hours (See footnote on page 3.8-2), the limitations on the Containment Building Vent and Purge System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorbers prior to discharge to the atmosphere.

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The minimum spent fuel pit boron concentration and the restriction of the movement of the spent fuel cask over irradiated fuel were specified in order to minimize the consequences of an unlikely sideways cask drop.

As shown in Figure 3.8-3, the maximum density spent fuel storage racks consist of two regions: Region 1 (Columns SS-ZZ, Rows 35-64) and Region 2 (Columns A-RR, Rows 1-34). Each region has been separately analyzed for close packed storage, where all cells in that region contain fuel of the highest allowable reactivity.

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The following criteria should be used to categorize Region 1 fuel assemblies. Unburned fuel assemblies at or below 4.2 w/o enrichment are Type A. Unburned fuel assemblies at or below 4.6 w/o enrichment (but greater than 4.2 w/o enrichment) are Type B. Fuel assemblies whose burnup puts them on or above the diagonal line below the Type A zone are defined as Type A.

Fuel assemblies to be stored in Region 2 of the spent fuel racks must have a minimum burnup exposure as a function of initial enrichment as specified in Figure 3.8-2. Administrative controls will provide verification that each fuel assembly to be placed in Region 2 satisfies the burnup criterion.

Mechanical stops incorporated on the bridge rails of the fuel storage building crane make it impossible for the bridge of the crane to travel further north than a point directly over the spot in the spent fuel pit that is reserved for the spent fuel cask. Therefore, it will be impossible to carry any object over the spent fuel storage areas north of the spot in the pit that is reserved for the cask with either the 40 or 5-ton hook of the fuel storage building crane. It is possible to use the fuel storage building crane to carry objects over the spent fuel storage areas that are directly east of the spot in the pit that is reserved for the cask. However, the technical specifications and plant procedures prevent any object weighing more than 2,000 pounds from being moved over any region of the spent fuel pit. Therefore, the storage areas directly east of the spot in the pit that is reserved for the cask are protected from heavy load handling by administrative controls.

Dead load tests and visual inspection of the hoists and cranes before handling irradiated fuel provide assurance that the hoists or cranes are capable of proper operation.

References

(1) FSAR - Section 9.5.2
~~(2) FSAR - Section 9.3~~