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James Knubel
Senior Vice President and
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January 28, 1999
IPN-99-009

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed Changes to Technical Specifications
Regarding Number of Operable Emergency
Diesel Generators Needed in Cold Shutdown Condition**

Dear Sir:

This application for amendment to section 3.7.F of the Indian Point 3 Technical Specifications proposes to modify the number of Emergency Diesel Generators (EDGs) needed to be operable in Cold Shutdown from two to one under certain conditions. It also provides Action Statements for those situations if Technical Specification 3.7.F.4 requirements are not met, where Action Statements did not previously exist. The proposed change utilized the Westinghouse Standard Technical Specifications, NUREG 1431, for guidance and is intended to provide operational flexibility and reduce refueling outage duration, while still providing an acceptable level of plant safety. The attached safety evaluation demonstrates that one EDG can provide the necessary safe shutdown loads when in Cold Shutdown or Refueling.

Indian Point 3 has three 480VAC Emergency power trains, with one EDG per emergency power train. These three Emergency power trains can be cross-tied in Cold Shutdown via bus tie breakers. Current Technical Specifications allow one EDG to be inoperable in Cold Shutdown. This requires EDG and associated equipment outages to be completed in series. This can lengthen an outage. The proposed change will allow maintenance on two EDGs and associated appropriate emergency bus equipment to be conducted in parallel. It also provides additional flexibility for outage management in these situations and minimizes the impact of EDG maintenance on the outage schedule. Potential outage time savings (depending upon 2,4,6,8,12, or 16 year EDG planned maintenance needs) could range anywhere from 6 to 10 days, with some or all of this time saving possibly on critical path. Changes to the Technical Specification Basis are also proposed to explain the revised requirements.

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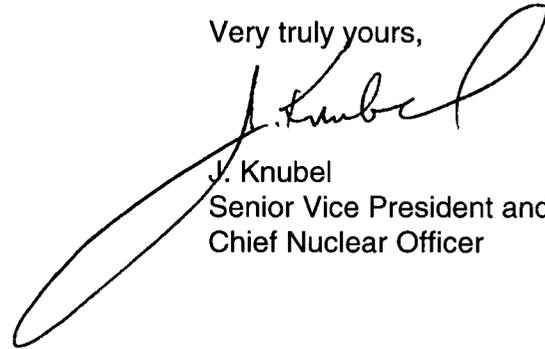
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Enclosed for filing is the signed original of the document entitled, "Application for Amendment to Operating License." Attachment I to this application is the proposed new Technical Specification, including the revised Basis pages. Attachment II is the associated safety evaluation. A markup of the current Technical Specification pages showing the proposed changes is provided in Attachment III, for information only. In accordance with 10 CFR 50.91, a copy of this application and the associated Attachments are being submitted to the designated New York State official.

As this Technical Specification change will impact the next refueling outage at Indian Point 3, it is requested that this license amendment request be dispositioned prior to the start of the outage, scheduled for 10 Sept 1999. If you have any questions, please contact Mr. Ken Peters, Licensing Manager at (914) 736-8029.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Knubel", is written over the typed name and title. The signature is fluid and cursive, with a large loop at the end.

J. Knubel
Senior Vice President and
Chief Nuclear Officer

cc: See next page

cc: Regional Administrator
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