

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



Robert J. Barrett
Site Executive Officer

June 7, 1999
IPN-99-063

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

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed Change to the Technical Specifications
Regarding PORC Review of the Fire Protection Program**

- Reference:
1. NYPA Letter, IPN-96-101, to NRC, "Proposed Change to the Technical Specifications Regarding PORC Review of Fire Protection Program," dated September 9, 1996.
 2. NYPA Letter, IPN-97-071, to NRC, "Supplement to Proposed Change to the Technical Specifications Regarding PORC Review of Fire Protection Program," dated June 6, 1997.
 3. NRC Letter to NYPA, "REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. M96629)," dated October 28, 1998.
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Dear Sir:

This letter is to request the NRC staff to re-initiate a review of the Technical Specification change proposed in References 1 and 2.

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The proposed change was to delete the Technical Specification 6.5.1.6.m requirement for the Plant Operating Review Committee (PORC) to review the fire protection program and implementing procedures. The proposed change was based on control of the fire protection program and implementing procedures using the requirements of 10 CFR 50.59. The NRC staff stated in Reference 3 that no amendment could be issued because Technical Specification Amendment 157 was acceptable, in part, due to the addition of Technical Specification 6.5.1.6.m. This position has recently changed as evidenced by NRC letter of April 12, 1999 on Docket 50-333. That letter approved a Technical Specification change removing the equivalent of our specification 6.5.1.6.m on a plant with a prior amendment similar to our Amendment 157. The NRC letter noted that a similar amendment for Indian Point 3 amendment could now be authorized.

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Based on this change in position, we respectfully request that you re-initiate review of our previous proposed Technical Specification change.

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The Authority is making no new commitments in this letter. If you have any questions, please contact Mr. Ken Peters.

Very truly yours,



Robert J. Barrett
Site Executive Officer
Indian Point 3 Nuclear Power Plant

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
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Buchanan, NY 10511

Mr. George F. Wunder, Project Manager
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