

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



**James Knobel**  
Senior Vice President and  
Chief Nuclear Officer

June 4, 1999  
IPN-99-061

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 Change to the Technical Specification  
Regarding Allowed Outage Time Associated with  
One Diesel Generator or Any Diesel Fuel Oil System**

Dear Sir,

This letter requests a change to the Indian Point 3 Technical Specification (TS) Limiting Condition for Operation (LCO) 3.7.B.1 to extend the allowed outage time (AOT) for the 32 Emergency Diesel Generator (EDG) and its Fuel Oil Storage Tank (FOST) from 72 hours to 7 days. This TS change would be applicable one-time only in 1999, prior to Refueling Outage (RO) 10, if needed, to allow for potential corrective maintenance repairs to the 32 EDG FOST. These repairs, if necessary, and the subsequent return of this FOST to operable status, could take longer than the presently permitted 72 hours AOT.

11  
A001

The 32 FOST experienced water in-leakage on two occasions in 1998. In each case, this water was pumped out and the water did not create an operability issue since bulk chemistry sampling and tank capacity readings indicated satisfactory results. It is believed that the accumulated water entered this FOST from the top of the tank through a penetration or through its upper side walls. No fuel oil leakage has been observed from the 32 FOST, or from the 32 EDG fuel oil system. This inspection and repair effort is presently scheduled in the next refueling outage, RO-10, within the 32 EDG work window. However, if there is further concern with water in-leakage between now and the start of RO-10, corrective maintenance on this tank may be necessary before the outage begins. In order to complete the repairs and testing required for this FOST, a 7-day AOT, where the 32 EDG FOST and 32 EDG are declared inoperable, may be needed to allow performing this maintenance at power and preventing an unnecessary plant shutdown.

9906150055 990604  
PDR ADOCK 05000286  
P PDR

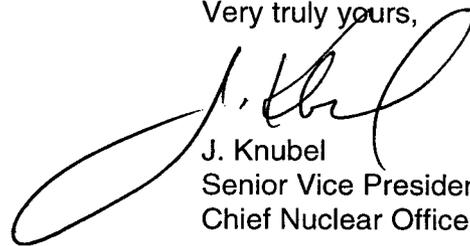
This proposed change would allow repair and testing of the 32 EDG FOST while the plant remains at power with the continued operability of 31 and 33 EDGs along with the necessary additional fuel oil available at the Buchanan substation as specified in LCO 3.7.A.5. The 32 EDG would be considered available, although declared inoperable, during this time since its fuel oil day tank can be filled from the other two FOSTs if needed. Probabilistic Risk Assessment (PRA) calculations for this proposed FOST outage were completed and indicate satisfactory results for the scenario involving loss of 32 EDG FOST for 7 days, while crediting the 32 EDG as available and capable of auto-start capability, although declared technically inoperable, during this time period.

Enclosed for filing is the signed original of the document entitled, "Application for Amendment to the Operating License." Attachment I to this application is the proposed change to the TS. Attachment II is the associated safety evaluation. A markup of the current TS page showing the proposed change is provided in Attachment III, for information only. Since this is a one-time TS change, that will expire once RO-10 starts, the Improved Technical Specification (ITS) proposal previously submitted does not require markup, as no change is needed to that submittal.

A copy of this letter with the attachment containing the application, proposed changes, safety evaluation and marked up Technical Specification pages is being provided to the designated New York State official as required by 10 CFR 50.91.

This submittal contains no new commitments. If you have any questions, please contact Mr. Ken Peters, IP3 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.

J. Knubel  
Senior Vice President and  
Chief Nuclear Officer

Attachments: As stated

cc: See next page

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

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 F. Wunder, Project Manager  
Project Directorate I  
Division of Reactor Projects I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop 8 C4  
Washington, D.C. 20555