January 12, 1999

LICENSEE: Power Authority of the State of New York

FACILITIES: Indian Point Nuclear Generating Unit No. 3 and James A. FitzPatrick Nuclear Power Plant

SUBJECT: SUMMARY OF THE DECEMBER 15, 1998, MEETING REGARDING IMPROVED STANDARD TECHNICAL SPECIFICATIONS

On December 15, 1998, the staff met with representatives of the Power Authority of the State of New York to discuss the Improved Standard Technical Specification amendment for Indian Point Unit 3. The amendment request was signed on December 11, 1998. Enclosure 1 is a list of those in attendance and Enclosure 2 is a copy of the licensee's handout.

Original signed by:

George F. Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosures: 1. List of Attendees
2. Licensee's Handout

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 AND JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DECEMBER 15, 1998

Name	Organization
W. Beckner	NRR/TSB
J. Kelly	PASNY
M. Weston	NRR/TSB
G. Wilverding	PASNY
G. Wunder	NRR/DRPE

Enclosure 1

INDIAN POINT 3 - IMPROVED TECHNICAL SPECIFICATIONS

NRC SUBMITTAL - December 15, 1998

GEORGE WILVERDING

PROJECT MANAGER

IP3 ITS

ITS - The Tech Specs for the next Millennium

Enclosure 2

IP3 Conversion to Improved Technical Specifications

I. Submittal Process & Contents

II. NRC Review Process

III. Implementation Preparation

I. Submittal Process & Contents

A. Starting Point for IP3 ITS

- Early 1970's Vintage Plant
- Custom Technical Specifications
- FSAR Verification Had Not Been Started Yet
- Problems with Using and Interpreting Current Tech Specs

I. Submittal Process & Contents

A. Starting Point for IP3 ITS (cont'd)

- ITS is first systematic look at the safety design and licensing bases of IP3 since it was licensed

  - Top Down Approach - starting with the GDC to look at how the requirements are being met today,

  Versus

  - FSAR and DBD efforts which are bottom up approach - looks at what was written down and verified it was correct

I. Submittal Process & Contents

B. Objectives of ITS Conversion:

- Ensure that IP3 Improved Technical Specifications are consistent with the IP3 design basis, IP3 accident analysis, and other industry requirements.

- Adopt industry standard format, nomenclature and requirements consistent with NUREG-1431.

I. Submittal Process & Contents

C. Approach Used in Development:

- Compared IP3 design and analysis to the design and analysis used in NUREG-1431; and
- Compared IP3 current Tech Specs to NUREG-1431.

I. Submittal Process & Contents

C. Approach Used in Development (cont'd)

Then

- Adopted NUREG-1431 where possible; or
- Maintained CTS (CLB) in the following cases:
  - If needed to address IP3 design difference; or
  - If needed to maintain an IP3 unique allowance.

When CLB maintained,

- Technical justification provided, and
- Modified to be consistent with NUREG-1431 to the extent practical
- Developed new Technical Specifications if neither ISTS nor CTS properly address IP3 design and analysis.

I. Submittal Process & Contents

D. Emphasis on IP3 ITS BASES

- Developing ITS was a significant "learning experience" for IP3.
- Bases modifications (mostly expansions) were essential especially in cases where adopting ITS results in a significant change in the understanding of what is required and why.
- Emphasis placed on ensuring Background and Safety Analysis Sections reflect the IP3 design and analysis, especially in cases where development of ITS resulted in improved or different understanding of existing requirements.
- LCO and SR sections expanded, in some cases, to improve clarity or ensure requirements are fully understood and consistently applied; especially in cases where development of ITS resulted in improved or different understanding of existing requirements.

I. Submittal Process & Contents

E. Internal Review Process

Entire submittal went through 3 full review cycles:

DRAFT A: Sent to System Engineers, Operators, Design Engineers, etc. Written comments evaluated and incorporated.

DRAFT B: Complete re-evaluation of the entire package to reflect Draft A comments, new research, and lessons learned from completing Draft A.

Targeted review to stakeholders: system engineers, design engineers, operators, maintenance engineers, licensing, training, etc. Second look by people who did the first review.

Line by Line review of every Specification and associated Bases.

Two way process; reviewers both provided insight to the ITS development team and learned from NUREG and research done by ITS development team.

I. Submittal Process & Contents

E. Internal Review Process (cont'd)

DRAFT C: Second round of meetings for "problem" specifications by Draft B reviewers.

Plant Operating Review Committee (PORC) Integrated Review

Line by line review of each spec and all 'M' and 'L' changes with at least two PORC members.

I. Submittal Process & Contents

F. Conversion Submittal - Organization and Contents

Full Compliance with NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996.

Divided into 127 stand alone packages for NRC review:

107 Technical specifications and 20 Relocated Items

Only Approved TSTF travelers incorporated, with one exception (ITSTF - 135, Rev. 2, RPS and ESFAS Instrumentation). Travelers identified on the cover sheets of each of the 107 packages.

All docketed TSCRs incorporated, (CTS page numbers included in each package, effective amendment and TSCRs are identified with each package)

I. Submittal Process & Contents

F. Conversion Submittal (cont'd)

Discussions of Change and NSHC include significantly more detail than previous ITS conversion submittals.

- Reference to both the CTS and IP3 ITS affected.
- Brief restatement of CTS and how ITS differs from CTS.
- Reason change is needed for more restrictive changes.
- Reasons change is acceptable.

Relocated CTS and removed detail being incorporated into programs with change control process (i.e., 10 CFR 50.54 or 10 CFR 50.59).

I. Submittal Process & Contents

G. Conversion Packages that Require Priority NRC Review

ITS LCO 3.4.12 Low Temperature Overpressure Protection

CLB is maintained but LCO is highly complex and significantly different than NUREG-1431.

ITS LCO 3.6.6 Containment Spray System and Containment Fan Cooler System

LCO and Allowable Out of Service Times relaxed to be consistent with NUREG-1431. Design and analysis assumptions differ from NUREG-1431.

ITS LCO 3.7.2 Main Steam Isolation Valves and Main Steam Check Valves.

CTS AOT significantly longer than NUREG-1431 is justified by recognition of role of separate Main Steam Check Valve.

ITS LCO 3.8.1 AC Sources - Operating

CLB maintained for diesel testing.

II. NRC Review Process

Need for most experienced reviewers for early vintage plant converting from custom Technical Specifications.

Need for early and frequent contact with NRC during the review process:

- **Ensure both sides understand issues and details before an RAI is written.**
- **Provide early and complete identification and resolution of "sticking points."**

NYPA will provide resources for prompt resolution of RAIs and requests for technical information.

Need the NRC to tell us what we can do to best support NRC review process.

III. Implementation Preparation

- NYPA is committed to implementation of ITS by June 2000 assuming the SER is completed by April 2000.
- Budgets and other resources for implementation in 1999 and 2000 are being provided.