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November 3, 1978
IPO-169

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Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Albert Schwencer, Chief
Operating Reactors Branch No. 1

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286

Dear Mr. Schwencer:

In response to your letter of August 28, 1978, enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled "Application for Amendment to Operating License on the Overpressure Protection System", and attachment thereto.

On January 6, 1978 Consolidated Edison Company of New York in its own right and as agent for the Power Authority of the State of New York applied for an amendment to revise the Technical Specification Section 3.6 Containment System, and Section 4.4, Containment Tests, of Appendix A to facility operating License DPR-64 to reflect installation of the Overpressure Protection System (OPS) at Indian Point 3 (IP3).

This supplement seeks to further amend Technical Specification Section 3.1A, Operational Components, Section 3.3A, Safety Injection and Residual Heat Removal Systems, Table 3.5-3, Instrumentation Operating Conditions for Engineered Safety Features, Table 4.1-1, Minimum Frequencies for Checks, Calibrations and Tests of Instrument Channels, Table 4.1-3, Frequencies for Equipment Tests, Section 6.9.2, Special Reports, and adds a new Section 4.14, Overpressure Protection System of Appendix A to Facility Operating License DPR-64. These changes are intended to assure operation of the Overpressure Protection System installed at Indian Point 3.

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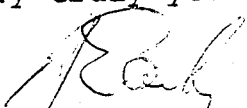
November , 1978

Based on plant design and operational experience to date, the Authority believes that the use of a pressurizer bubble during startup of the initial reactor coolant pump (RCP) significantly reduces the effects of reactor coolant system (RCS) pressure transients and the potential for exceeding the 10 CFR 50, Appendix G, limits. The pressurizer bubble affords protection beyond that provided by the OPS alone. In addition, since we instituted the use of the pressurizer bubble at Indian Point 3, we have not experienced an overpressure incident. However, to establish a minimum bubble size for use as a technical specification limit, further detailed analyses need to be performed. Since the Authority believes that the current use of a pressurizer bubble represents an important and viable option, we are undertaking in conjunction with Consolidated Edison the analytical effort required to establish a minimum bubble size.

The Authority has classified this application for amendment to the operating license as Class III, as it involves the single safety issue of the OPS. Enclosed is a check in the amount of \$4,000 as the filing fee per 10 CFR §170.22, which the Authority pays under protest pending a final determination of the legality of the fee schedule.

In support of this application, we are enclosing forty (40) copies of the Safety Evaluation corresponding to this proposed change.

Very truly yours,


Paul J. Early
Assistant Chief Engineer-Projects