ATTACHMENT II

SAFETY EVALUATION

RELATED TO

MINIMUM WATER LEVEL DURING FUEL MOVEMENT

POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
OCTOBER 31, 1980

Section I - Description of Modification

Section 3.8 of Appendix A (Refueling, Fuel Handling and Storage) is amended to change the reference point for establishing the minimum water level during fuel movement. Previously, the minimum water level was measured from the top of the irradiated fuel assemblies inside the reactor pressure vessel. This modification retains the same minimum water depth (23 feet), while moving the reference plane to the top of the reactor pressure vessel flange thereby increasing the water depth above fuel assemblies.

Section II - Purpose of Modification

The purpose of this modification is to assure that a sufficient depth of water covers irradiated fuel assemblies within the reactor pressure vessel during fuel movement to prevent inadvertent exposure of a fuel assembly during transfer. This modification is in response to the Commission's August 15, 1980 letter to Westinghouse PWR licensees on this subject.

Section III - Impact of the Change

These modifications will not alter the conclusions reached in the FSAR and SER accident analysis.

Section IV - Implementation of the Modification

The modifications as proposed will not impact the ALARA or Fire Protection Program at IP3.

Section V - Conclusion

The incorporation of these modifications: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; and c) will not reduce the margin of safety as defined in the basis for any Technical Specifications, and d) does not constitute an unreviewed safety question.

Section VI - References

(a) IP3 FSAR

(b) IP3 SER

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