

OCT 04 1984

Docket No. 50-286

Power Authority of the State of New York
Indian Point 3 Nuclear Power Plant
ATTN: Mr. J. C. Brons
Resident Manager
P. O. Box 215
Buchanan, New York 10511

Gentlemen:

Subject: Inspection No. 50-286/84-04

This refers to your letter dated July 16, 1984, in response to our letter dated June 15, 1984, and to our telephone discussion with members of your staff and Messrs. J. P. Durr and K. A. Manoly of my staff on August 29, 1984.

In your letter of July 16, 1984, you disagreed with the violation cited in Inspection Report 50-286/84-04 based on the existence of Project Procedure No. 9, "Pipe Stress Analysis". In our telephone discussion on August 29, 1984, with Mr. S. Zulla et al, of your staff, we stated that Project Procedure No. 9 was never presented to the NRC inspectors for review, but that Attachment III to IUP-6600, titled "Guidelines for Nuclear Pipe Stress Analysis" was provided. Discussions, subsequent to the inspections, disclosed that the guidelines were assembled as representative practices used during the bulletin reanalyses but were not documented until recently. We understand that the guidelines are representative of Project Procedure No. 9, and essentially the same.

It has further been established that the input data to the 1979 reanalysis is not consistent with the guidelines in certain areas and, specifically, in mass lumping and frequency cutoff techniques. In any event, if the guidelines did not exist until recently, then the violation is accurate. However, if the guidelines or its equivalent, Project Procedure No. 9, did exist at the time of reanalyses, then the reanalysis did not comply with the procedural guidance and a violation is still appropriate.

In either case, the overriding concern is the adequacy of the piping system analyses to assure plant safety. Based on the reanalyses of the two problems you performed in response to our June 15, 1984 letter and to our review of the results, we are confident that the piping systems are acceptable for continued operation. As a result of the August 29, 1984, telephone discussion, we understand that you will reanalyze two more piping system problems which will be selected based on a sampling review for modeling extremes which are indicative of increased loadings. These reanalyses will be available for our review on or about October 1, '84.

These actions will be examined during a future inspection of your licensed program. No response to this letter is required.

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Your cooperation with us is appreciated.

Sincerely,

for 
 Thomas T. Martin, Director
 Division of Engineering and
 Technical Programs


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
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bcc w/encl:

Region I Docket Room (with concurrences)
 Senior Operations Officer (w/o encls)
 DPRP Section Chief

RI:DETP
 K.Manoly/sm
 9/10/84
KM


 RI:DETP
 J.Durr
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 S.Ebnetter
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