

**TABLE LA - REMOVED DETAILS AND LESS RESTRICTIVE ADMINISTRATIVE CHANGES TO THE CTS
ITS SPECIFICATION 3.5 - EMERGENCY CORE COOLING SYSTEMS (ECCS)**

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.1 - ACCUMULATORS					
LA1	3.3.A.3.d Table 4.1-1	TRM	CTS require operation of one pressure and one level transmitter per accumulator with calibration every 18 months. ITS require ECCS accumulator pressure and level be within limits, but the requirement for operation of one pressure and one level transmitter per accumulator will be in TRM. This change is acceptable because meeting the ITS requires at least one pressure and one level transmitter operating for each accumulator and that these instruments are calibrated. Therefore, maintaining the requirement in Technical Specifications that ECCS accumulator pressure and level must be verified within required limits every 12 hours and maintaining requirements for operation and calibration of instruments required to perform these verification in the TRM provides an adequate level of assurance that ECCS accumulators will be maintained within required limits.	10 CFR 50.59	1

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Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.B.2. b	IST Program	CTS require that accumulator check valves be checked for operability once per 24 months. ITS keep the requirement that ECCS accumulators be operable, but the requirement to test the accumulator check valves is included in the Inservice Test (IST) Program. The IST program is required by ITS 5.5.7. In addition, 10 CFR 50.55a(f) provides the regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves are covered by an IST Program. Thus, keeping the requirement that ECCS accumulators must be operable in ITS 3.5.1 and keeping the requirement for periodic testing of accumulator check valves in the IST Program required by ITS 5.5.7 ensures that check valves will be tested and maintained to ensure ECCS accumulator operability.	ITS 5.5.7 10 CFR 50.55a(f))	4

Enclosure 2

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Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
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DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.2 - ECCS - OPERATING					
LA1	3.3.A.3.e 3.3.A.3.f 3.3.A.3.g	IST Program ITS 3.5.2 BASES FSAR	CTS require three SI pumps, two RHR pumps and heat exchangers, and two recirculation pumps with associated piping and valves when the reactor is > 350°F. ITS require three ECCS trains with definitions in the Bases and system descriptions in the FSAR. The Bases specify that ECCS has three separate systems: HHSI, RHR, and recirculation. Each is divided into subsystems: three 50% capacity HHSI subsystems; two 100% capacity RHR subsystems; and, two 100% capacity recirculation subsystems. Each of these includes valves, heat exchangers, and flow paths. The subsystems are grouped into three trains so that any two can meet all assumed ECCS capability. Setting ECCS requirements in terms of trains with the subsystems and trains defined in the Bases ensures that requirements are understood and consistently applied. ITS keep the existing operability requirement for three ECCS trains; so, there is no change to existing requirements nor safety level.	10 CFR 50.59 ITS 5.5.13	2

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Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
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- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA2	4.5.B.1	IST	CTS require starting the pump quarterly and operating 15 minutes at required pressure for the SI, RHR, CS, and auxiliary component cooling water pumps; and every 24 months for recirculation pumps. ITS keep the requirements to verify each ECCS pump's developed head \geq required head, but frequency is specified according to the IST Program. In addition, the requirement to run each pump 15 minutes is also moved to the IST. The IST Program is required by ITS 5.5.7 and controls inservice testing of ASME Code Class 1, 2, and 3 components. In addition, 10 CFR 50.55a(f) provides regulatory requirements for this IST Program, and specifies that ASME Code Class 1, 2, and 3 pumps and valves be covered by an IST Program.	10 CFR 50.55.a(f) ITS 5.5.7	1
LA3	4.5.A.1. a 4.5.A.1. b 4.5.A.1. d	ITS 3.5.2 BASES	CTS include detail on ECCS test conditions, performance, and acceptance criteria. ITS keep the requirements for testing ECCS subsystem initiation and positioning of stops for HHSI injection valves, but, detail on SI system test conditions, performance, and acceptance criteria are moved to the ITS Bases.	ITS 5.5.13	1

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Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
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- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
LA4	3.3.A.3. n	FSAR Plant procedures.	CTS require RCS temperature not exceed 350 °F unless RHR is in ESF alignment with the normal RHR suction line isolated from RCS. This protects RHR from overpressurization. This lineup is not in ITS 3.5.2 but is in the FSAR and is implemented by procedures.	10 CFR 50.59	1
ITS SPECIFICATION 3.5.3 - ECCS - SHUTDOWN					
LA1	3.3.A.1. e 3.3.A.1. d	FSAR ITS 3.5.3 BASES	CTS require operability of one RHR pump and heat exchanger and one recirculation pump with piping and valves when the reactor is $\geq 200^{\circ}\text{F}$ but $\leq 350^{\circ}\text{F}$. ITS require operability of one RHR train and one Recirculation train as defined in the ITS 3.5.3 Bases and FSAR.	10 CFR 50.59 ITS 5.5.13	2

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LA-5

Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
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- 4 - Administrative requirements redundant to regulations

DOC	CTS	Destination Document	Description	Control	Change Type
ITS SPECIFICATION 3.5.4 - REFUELING WATER STORAGE TANK (RWST)					
LA1	Table 4.1-2, item 5	Procedures	CTS requires monthly analysis of ph for the RWST. This requirement is not being retained in ITS and is being relocated to plant procedures. This relocation is acceptable because ph does not influence the ITS RWST requirement for water level and boron concentration.	10 CFR 50.59	3

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Section 3.5

Change types for LA-Table

- 1 - Details of system design and system description including design limits
- 2 - Description of system or plant operation
- 3 - Procedural details for requirements and related reporting problems
- 4 - Administrative requirements redundant to regulations