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February 14, 2001
IPN-01-012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
**Proposed One-Time Change to the Technical Specification
Regarding Allowed Outage Time Associated
With One Diesel Generator or Any Diesel Fuel Oil System**

Dear Sir,

This letter requests a change to the Indian Point 3 Technical Specification (TS) Limiting Condition for Operation (LCO) 3.7.B.1 to extend the allowed outage time (AOT) for each of the 31, 32, and 33 Emergency Diesel Generator (EDG) and the associated Fuel Oil Storage Tanks (FOSTs) from 72 hours to 14 days. This TS change would be applicable one-time only for each EDG FOST during 2001 prior to August 31, 2001, if needed, to allow for potential corrective maintenance repairs to each of the 31, 32, or 33 EDG FOSTs. These repairs, if necessary, and the subsequent testing and return of the FOST to operable status, could take longer than the presently permitted 72-hour AOT.

The 31 and 32 FOSTs each experienced water in-leakage on one occasion in January 2001. In each case, the water was pumped out and this water did not create an operability issue since bulk chemistry sampling, tank capacity readings and the amount of water pumped out of these FOSTs indicated satisfactory results and minimal EDG impact. It is believed that accumulated water possibly entered these FOSTs from the top of the tank through a penetration. No fuel oil leakage has been observed from the 31, 32 or 33 FOST, or from the 31, 32 or 33 EDG fuel oil system. However, if there is further concern with water in-leakage between now and the start of RO-11 on the 31, 32 or 33 EDG FOSTs, due to individual tank or extent of condition concerns, corrective maintenance activity may be necessary on-line during 2001 prior to August 31, 2001. In order to complete the repairs and testing required for a FOST, a 14-day AOT, where the EDG FOST and associated EDG are declared inoperable, may be needed to allow performing this maintenance at power and preventing an unnecessary plant shutdown.

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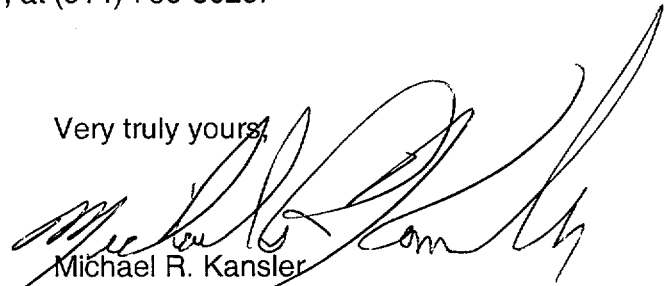
This proposed change would allow repair and testing of each of the 31, 32 or 33 EDG FOSTs while the plant remains at power with the continued operability of the remaining two EDGs along with the necessary additional fuel oil available at the Buchanan substation as specified in LCO 3.7.A.5. The EDG associated with the FOST being repaired would be considered available, although declared inoperable, during this time since its fuel oil day tank can be filled from the other two FOSTs if needed. Probabilistic Risk Assessment (PRA) calculations for this proposed FOST outage were completed and indicate satisfactory results for individual scenarios involving loss of 31, 32 or 33 EDG FOST for up to 14 days. These PRA calculations credit the associated EDG as available and capable of auto-start capability, with fuel oil from the other running EDG FOSTS, although declared technically inoperable during this time period.

Enclosed for filing is the signed original of the document entitled, "Application for Amendment to Operating License." Attachment I to this application is the proposed change to the TS. Attachment II is the associated safety evaluation. A markup of the current TS page showing the proposed change is provided in Attachment III, for information only. Attachment IV is the markup to the applicable Improved Technical Specification (ITS) sections as well.

A copy of this letter with the attachment containing the application, proposed changes, safety evaluation and marked up Technical Specification pages is being provided to the designated New York State official as required by 10 CFR 50.91.

This submittal contains no new commitments. If you have any questions, please contact Mr. Ken Peters, IP3 Licensing Manager, at (914) 736-8029.

Very truly yours,



Michael R. Kansler
Senior Vice President and
Chief Operating Officer

Attachments: As stated

cc: See next page

cc: Regional Administrator
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Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

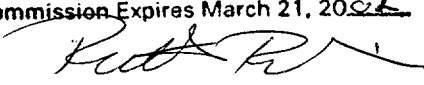
In the Matter of
ENTERGY NUCLEAR OPERATIONS, INC.
Indian Point Nuclear Generating Unit No. 3

)
) Docket No. 50-286
)

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Entergy Nuclear Operations, Inc. (ENO), as holder of Facility Operating License No. DPR-64, hereby applies for an Amendment to the Technical Specifications (TS) contained in Appendix A of the license. This application for amendment to the Indian Point 3 TS proposes to revise Specification 3.7.B.1 to extend the allowed outage time (AOT) for each of the 31, 32 or 33 emergency diesel generators (EDG) and for each of the 31, 32 or 33 EDG fuel oil systems from 72 hours to 14 days. This is a one-time change and it is driven from the potential necessity to inspect and repair each of the 31, 32 or 33 EDG fuel oil storage tanks (FOST) on-line during 2001 prior to August 31, 2001. This TS amendment includes an asterisk note supplementing TS 3.7.B.1 for each of the 31, 32, or 33 EDG FOSTs to be out of service on a one-time basis, while the associated EDG is technically inoperable but still made available and capable of automatic start, for up to 14 days with additional administrative requirements specified to be met. The Improved Technical Specifications (ITS) Limiting Conditions for Operation (LCO) sections 3.8.1.B and 3.8.3.A are also proposed for change with similar asterisk note annotation, since the ITS is expected to be implemented on or about March 19, 2001 at IP3.

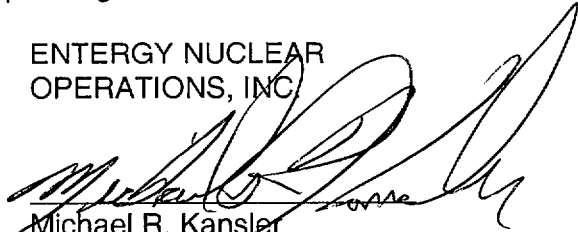
The proposed change to the TS is presented in Attachment I to this application. The safety evaluation for this change is provided in Attachment II. A markup of the affected TS change is provided in Attachment III, for information only. Attachment IV includes the markup of the proposed changes to the appropriate, pending ITS sections.

RUTH ROBINSON
Notary Public, State of New York
No. 30-4926984
Qualified in Westchester County
Commission Expires March 21, 2002


STATE OF NEW YORK
COUNTY OF WESTCHESTER
Subscribed and sworn to before me
This 14 day of February 2001.

Notary Public

ENTERGY NUCLEAR
OPERATIONS, INC.


Michael R. Kansler
Senior Vice President and
Chief Operating Officer

ATTACHMENT I TO IPN-01-012

**PROPOSED CHANGE TO THE TECHNICAL SPECIFICATION
REGARDING ONE – TIME ALLOWED OUTAGE TIME ASSOCIATED WITH
ONE DIESEL GENERATOR OR ANY DIESEL FUEL OIL SYSTEM**

Affected Technical Specification page:

3.7-2

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

6. Three batteries plus three chargers and the D.C. distribution systems operable.
 7. No more than one 120 volt A.C. Instrument Bus on the backup power supply.
- B. The requirements of 3.7.A may be modified to allow any one of the following power supplies to be inoperable at any one time.
1. One diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 72 hours* provided the 138 KV and the 13.8 KV sources of offsite power are available, and the engineered safety features associated with the remaining diesel generator buses are operable. If the inoperable diesel generator became inoperable due to any cause other than preplanned maintenance or testing, then within 24 hours, either:
 - a. Determine by evaluation, that the remaining operable diesel generators are not inoperable due to common-cause failure.
- OR
- b. Verify by testing, that the remaining diesel generators are operable.
 2. The 138 KV or the 13.8 KV sources of power may be inoperable for 48 hours provided the three diesel generators are operable. This operation may be extended beyond 48 hours provided the failure is reported to the NRC within the 48 hour period with an outline of the plans for restoration of offsite power and NRC approval is granted.

* Each of 31, 32 or 33 emergency diesel generator (EDG) fuel oil storage tanks (FOSTs) may be inoperable and its associated EDG may be declared technically inoperable, but available and capable of automatic start, for up to 14 days, one-time only if needed, during 2001 prior to August 31, 2001. This condition may only be invoked to inspect/repair each of 31, 32 or 33 EDG FOSTs once, if deemed necessary based on concerns with water in-leakage. The following additional requirements shall also be met for each FOST inspection/repair to invoke this extended one-time allowed outage time: (1) performance of offsite power source switching or maintenance evolutions for technical specification required offsite power sources shall not be scheduled during these 31, 32 or 33 FOST outages, and (2) these 31, 32 or 33 FOST outages shall not be scheduled during predicted severe weather.

ATTACHMENT II TO IPN-01-012

**SAFETY EVALUATION FOR
PROPOSED CHANGE TO THE TECHNICAL SPECIFICATION
REGARDING ONE-TIME ALLOWED OUTAGE TIME ASSOCIATED WITH
ONE DIESEL GENERATOR OR ANY DIESEL FUEL OIL SYSTEM**

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

I. Description of Proposed Change

This application proposes an amendment to the Indian Point 3 (IP3) Technical Specification (TS) to revise TS Limiting Condition for Operation (LCO) 3.7.B.1 to provide a one-time 14-day allowed outage time (AOT) for the purpose of performing corrective maintenance/repairs for each of the 31, 32 and 33 Emergency Diesel Generator (EDG) Fuel Oil Storage Tanks (FOSTs). TS 3.7.B.1 presently allows 72 hours for one EDG and/or EDG fuel oil system to be inoperable when above cold shutdown, provided that offsite power sources are available, Engineered Safety Features (ESF) associated with the remaining EDGs are operable and the remaining EDGs are operable. Included within this TS change is the requirement to maintain the associated EDG available and capable of automatic start during this proposed AOT, since the associated fuel oil day tank can be filled from the remaining two FOSTs. Several additional administrative requirements are added into this proposed one-time change to minimize risk of losing offsite power sources including: (1) not scheduling performance of switching or maintenance of TS required 13.8kV and 138 kV offsite power sources during the FOST outage time and (2) not scheduling this extended allowed outage time for the FOST during predicted severe weather. This potential FOST corrective maintenance could reasonably extend beyond 72 hours and take up to 14 days to complete. This change will not affect any other parts of the TS and would only be applicable for the specific instance of a one-time repair and restoration for each of 31, 32, and 33 EDG FOSTs, if needed, during 2001 prior to August 31, 2001.

II. Purpose of Proposed Change

Because the 31 and 32 EDG FOSTs have recently been determined to have intermittent water intrusion, it may need to be opened, drained, repaired and tested if Entergy deems that repairs are required in connection with water in-leakage. This TS change would allow addressing potential concerns with water in-leakage to the 31 and 32 EDG FOSTs or 33 EDG FOST, if necessary, where tank repair is considered prudent or necessary. The proposed AOT extension would enable Entergy to continue operation of IP3 and avoid an unnecessary shutdown in the months just before or after RO-11, and prior to August 31, 2001, should tank repair(s) be necessary as emergent corrective maintenance items.

III. Safety Implication of Proposed Changes

In January 2001 water was found in the 31 and 32 EDG FOST during routine chemistry sampling. The fuel oil in these tanks was determined to be in-specification and the water was subsequently pumped out. IP3 Deviation Event Reports (DERs) were written to address these situations and consider extent of condition. An IP3 corrective action plan was prepared in January 2001 to pursue permanent resolution to the water in-leakage of these FOSTs (#31 and #32) and consider the impact on the remaining EDG FOST (# 33) as well.

This action plan includes, among other items, additional inspection of fuel oil pipes at the bottom of the FOST valve pit for through wall corrosion as well as increasing the frequency of fuel oil sampling as required. Provisions in this action plan also call for on-line repair of each of the 31, 32, or 33 tanks, if deemed necessary in connection with observed in-leakage. These emergent FOST planned inspection and repair efforts would exceed the available 72-hour LCO time. However, this corrective maintenance is expected to be able to be completed within a 14-day period. Although the 31 and 32 FOSTs and the fuel oil system and associated EDGs are presently considered operable based upon in-specification FOST capacity and bulk chemistry samples, this situation could degrade while IP3 is on-line. This could subsequently cause the fuel oil system for this EDG to become inoperable with an attendant plant shutdown probably needed for tank repair, since the expected repair will likely extend beyond 72 hours, from opening the tank through final system restoration testing. Besides the normal monthly FOST water sampling, additional samples are being taken on the 31, 32 and 33 EDG FOSTs, as required, in the event of excessive precipitation, such as heavy rains or snow. This more frequent sampling should allow IP3 to determine the need for tank maintenance with all deliberate speed.

The Fuel Oil System of the three EDGs at IP3 is designed to provide individual FOSTs for each of the EDGs. These individual FOSTs are each equipped with a single vertical fuel oil transfer pump that discharges oil into either of two headers, normal and emergency, according to the manual valving arrangement selected. Both of these headers connect to 175-gallon fuel oil day tanks with one day tank dedicated to each of the three diesel engines. When the associated day tank level drops to a nominal setpoint just below 90%, the day tank inlet valves open. Upon decrease in level in any one of the three day tanks to the 65 percent level, an automatic start of the respective fuel oil transfer pump associated with that day tank would occur. Since each fuel oil transfer pump is capable of supplying fuel oil to all three EDGs via their respective day tanks, this arrangement assures the availability of fuel oil to each EDG. As per the IP3 Final Safety Analysis Report (FSAR), approximately 12,012 gallons of fuel oil (11,782 in storage tanks and 230 in day tanks) is available assuming the unlikely event that one EDG FOST is unavailable. This capacity is sufficient to operate two EDGs at minimum safeguards for at least 48 hours.

An additional minimum on-site storage of 30,026 gallons is necessary to assure continuous operation of two EDGs at minimum safeguards load for a total of 168 hours. This reserve is in addition to the storage requirements for other plants at the site.

For the purposes of this possible 14-day repair of each of the 31, 32 or 33 EDG FOSTs, and the associated EDG would be considered available, although declared inoperable and aligned for automatic start capability. This is because, although its respective, associated FOST and fuel oil transfer pump are not available for the term of this corrective maintenance, the declared inoperable EDG is able to have its fuel oil day tank supplied with fuel oil from another FOST (either 31, 32 or 33, whichever of the two remains operable) via the normal or emergency fuel oil supply headers. As a further backup, if needed, operator action can be utilized to supply the associated EDG fuel oil day tank from another EDG FOST via existing System Operating Procedure (SOP) EL-1, "Diesel Generator Operation". The present design of the EDG fuel oil system as well as SOP-EL-1 operator manual action, allows the associated EDG to be available in the event there is a need for its use.

The two remaining FOSTs are designed to supply fuel oil to all three EDGs via the fuel oil supply headers (via the normal and emergency header arrangement) to each of the three EDG fuel oil day tanks. In doing this, any of the two remaining FOSTs being initially filled with at least 6671 gallons of fuel oil, have the ability to supply all three EDGs.

By maintaining the associated EDG available, additional backup support is provided during this 14-day AOT, if for some reason one of the remaining 2 operable EDGs does not start and load as required in response to an initiation signal. To compensate for three EDGs starting and running, in case of a extended DBA requiring their actuation, with any two underground FOSTs available, additional fuel oil would be required within the 48-hour and 168-hour design bases required time frames to assure continuous operation of two EDGs at minimum safeguards loads. This would require IP3 to closely monitor EDG fuel consumption and move needed additional fuel in the required time frame to ensure continued EDG operation to support minimum shutdown loads as necessary. This additional fuel, if needed, would be transported to the installed, underground EDG FOSTs by truck. Administrative controls, such as Indian Point 2/3 Memorandum of Understanding No.7, "Rules Governing The Maintenance And Use Of A Dedicated (By Consolidated Edison For The Power Authority) Diesel Fuel (No. 2) Supply" and IP3 operations procedure SOP-EL-9, "Filling The Diesel Fuel Oil Storage Tanks", are in place to assist in obtaining the necessary additional TS required fuel oil of 30,026 gallons from other normal supply tanks on the Indian Point site or at the Buchanan Substation. Further, additional fuel oil (beyond the TS required amounts) could also be provided from other Indian Point site/Buchanan Substation storage locations (30,000 and 200,000 gallon seismic class III tanks) or from locally available sources, where about 25,000 gallons can be delivered on a one or two-day notice.

Finally, additional fuel oil supplies are available in the region (about 40 miles from the site) and are available for use during emergencies, subject to extreme cold weather conditions (increased domestic heating usage) and available transportation. These various EDG fuel oil supply sources, along with the necessary administrative controls to supply them to the EDG FOSTs, provide Entergy the necessary EDG fuel oil for supporting extended operation of the three EDGs, if required, to meet FSAR design bases required time frames and provide at least two EDGs with continuous operation at minimum safeguards loads.

In conjunction with the above discussion of the associated EDG being made available during this AOT and the provisions for EDG fuel oil supplies to support EDG design bases continuous operation requirements, this one-time extended AOT for each of the EDG FOST repairs is further justified for several reasons:

- (1) IP3 TS required off-site power 138kV and 13.8kV distribution systems are independent. There are two separate TS feeders each for 138kV and 13.8kV offsite sources as dependable power supplies to minimize the reliance on EDGs and supply the 480 VAC electrical distribution system;
- (2) The additional requirements added to this proposed TS change to allow this one-time condition involve further minimization of potential risk associated with losing offsite power sources when extending this AOT to 14 days. By not scheduling TS offsite power switching or maintenance as well as not scheduling the selected FOST AOT during severe weather conditions, which could impact offsite power availability, greater defense in depth is provided during this evolution; and
- (3) IP3 uses a proceduralized on-line work scheduling process. This station directive, SPO-SD-03, "On-Line Work Scheduling Process", provides decision-making and planning guidance for the execution of system and component outages, applicable when reactor coolant system (RCS) temperature is greater than 350 degrees F. This work process is based upon probabilistic risk assessment (PRA) and sound operating judgement. As mentioned, included within the overall process involving operation of the associated EDG, as it is still being maintained available and aligned for automatic start capability, is operator action, if necessary, to supply fuel oil to the associated fuel oil day tank as a backup method via operations procedure SOP-EL-1, "Diesel Generator Operation".

Entergy performed site-specific probabilistic risk assessment (PRA) calculations of the proposed one-time increased AOT duration of up to 14 days to quantify the risk. The PRA calculations concluded that, for the case of separately removing each of 31, 32 or 33 EDG FOSTs only and having the associated EDG and associated remainder of its fuel oil system available (though declared inoperable) for use if needed, the conditional core damage probability is below the threshold value of $1E-6$. Therefore, sufficient risk-informed safety margin exists for the duration of the proposed, one-time extended 31, 32 or 33 EDG fuel oil system AOT, while keeping the associated EDG available throughout.

IV. Evaluation of Significant Hazards

Entergy has evaluated the proposed Technical Specification change using the criteria of 10CFR50.92 and found that no significant hazards consideration exists for the following reasons:

- 1) Does the proposed License amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed License amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The EDGs and their associated fuel oil systems are not part of any accident initiation; therefore there is no increase in the probability of an accident.

At a minimum, two EDGs are still available with sufficient fuel oil supply to mitigate IP3 design basis accidents. The minimum safeguards equipment can still be powered even if one EDG and FOST is assumed to be lost due to single failure. This has been verified by EDG loading calculation, IP3-CALC-ED-00207, "480V Bus 2A, 3A, 5A & 6A and EDGs 31,32 and 33 Accident Loading". With the associated EDG available and aligned for automatic start capability (although declared inoperable) during this EDG FOST outage, further backup to the remaining two EDGs is provided. By the design of the overall EDG fuel oil system, the associated EDG fuel oil day tank is able to be supplied with sufficient fuel oil supply from either of the remaining two FOSTs, via their transfer pumps, in order to support operation of this associated EDG, if necessary.

To support fuel oil needs of all three EDGs, if necessary, the FSAR describes that additional fuel oil supplies are available on the Indian Point site and locally near the site. Further EDG fuel oil supplies are available in the region, about 40 miles from IP3. Overall, the EDGs are designed as backup AC power sources in the event of a Loss of Offsite Power (LOOP). The proposed one-time AOT for each EDG/FOST does not change the conditions or minimum amount of safeguards equipment assumed in the safety analysis for design basis accident mitigation, since a minimum of two EDGs is assumed. No changes are proposed as to how the EDGs provide plant protection. Additionally, no new modes of overall plant operation are proposed as a result of this change. A PRA evaluation determined that the conditional core damage probability (CCDP) for these scenarios is less than the threshold value of 1 E-6 . Therefore, the proposed one-time license amendment to TS 3.7.B.1 does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the proposed License amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not introduce any new overall modes of plant operation or make any permanent physical changes to plant systems necessary for effective accident mitigation. The minimum required EDG operation remains unchanged by removal of a single FOST for repair. Additionally, added requirements to minimize risk associated with loss of offsite power also support this one-time extended AOT. Also, as previously stated, the EDGs and FOSTs are not part of any accident initiation scenario. Therefore the proposed one-time license amendment to TS 3.7.B.1 does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3) Does the proposed License amendment involve a significant reduction in a margin of safety?

No. The proposed License amendment does not involve a significant reduction in a margin of safety. The minimum safeguards loads can be maintained available if needed for design basis accident mitigation with two EDGs operable combined with their respective FOSTs. The selected, inoperable EDG will be available and aligned for automatic start capability (though declared inoperable) during this outage. The additional fuel oil needed to support three EDGs in this condition is available as indicated in the present design and licensing basis. The FSAR describes that this fuel can be provided from the Indian Point site, local sources and from a source about 40 miles away to support the additional 30,026 gallons TS required fuel oil, already existing at the Buchanan substation. Therefore, sufficient fuel oil will be available for potential events that could occur during this 14-day AOT. The PRA evaluation for the case of maintaining the 31, 32 or 33 EDG available (though declared inoperable) with its FOST out for repair indicates an acceptable safety margin below the risk-informed threshold of $1E-6$.

The 480VAC electrical distribution system can be fed from a number of TS independent 13.8kV and 138kV offsite power sources to minimize reliance of IP3 on EDG power sources during the extended AOT requested. Additional requirements to minimize risk associated with the potential for loss of offsite power sources within this TS change also ensure that this extended AOT does not involve a significant reduction in safety margin. On this basis, the proposed one-time license amendment to TS 3.7.B.1 does not involve a significant reduction in the margin of safety.

V. Implementation of Proposed Changes

The proposed TS change will not adversely affect the ALARA Program, the Security and Fire Protection Programs, or the Emergency Plan. This conclusion is based on the type of change being made in comparison to the purpose, scope and content of these programs. The physical changes to the FOST(s) of concern would involve corrective maintenance repairs, if deemed necessary, and do not change the associated EDG fuel oil system licensing or design function, as design provision already exists for filling the associated EDG day tank with fuel oil from the other two EDG FOSTs. The proposed changes also do not effect the conclusions of the Final Safety Analysis Report or the Safety Evaluation Report because IP3 plant design in the analyzed Design Basis Accidents relies on two EDGs operating at minimum safeguard loads, if required. The single failure assumption is suspended while in LCO action statements. The associated EDG is still available and aligned for automatic start capability during this one-time extended AOT, if required for electrical loading. Additional fuel oil supplies as specified by current design and licensing bases are available to support extended fuel needs to all three EDGs, via an IP2/IP3 Memorandum of Understanding and use of SOP-EL-9, "Filling the Diesel Fuel Oil Storage Tanks", if needed, during this 14-day AOT. These design bases fuel oil supplies are available to assure continuous operation of two EDGs at minimum safeguards loads for the required design bases time frames of 48 and 168 hours. Further, System Operating Procedure, SOP-EL-1, "Diesel Generator Operation", has backup provision for operator action in filling the associated EDG fuel oil day tank from the remaining two EDG FOSTs to further ensure that the associated EDG can receive the necessary fuel oil and perform its function if required.

VI. Conclusions

The incorporation of these changes:

- a) will not involve a significant increase in the probability or the consequence of an accident or malfunction of equipment important to safety as previously evaluated in the Final Safety Analysis Report;
- b) will not create the possibility of a new or different kind of accident from any accident previously evaluated in the Final Safety Analysis Report;
- c) will not significantly reduce the margin of safety as defined in the bases for any Technical Specifications; and
- d) involves no significant hazards considerations as defined in 10CFR50.92.

The Plant Operating Review Committee (PORC) and Safety Review Committee (SRC) have reviewed this proposed one-time change to the TS and have concluded that it does not involve an unreviewed safety question (USQ) or a significant hazards consideration and will not endanger the health and safety of the public.

VII. References

1. Indian Point 3 Updated Final Safety Analysis Report (FSAR) , dated December 1997
2. NRC Safety Evaluation Report (SER) for Indian Point 3 Nuclear Generating Station and Supplements 1,2 and 3 dated September 21, 1973, February 21, 1975 and April 5, 1976.
3. RE-99-025, "IP3 – Evaluation of Fuel Oil Storage Tank Extended Outage", dated April 12, 1999.
4. IP3 System Operating Procedure, SOP-EL-1, "Diesel Generator Operation", Revision 23 dated October 10, 1997.
5. NRC Generic Letter 80-30, "NRC Letter Clarifying The Term Operable As It Applies To The Single Failure Criterion For Safety Systems", dated April 10, 1980.
6. IP3 Procedure, SPO-SD-03, "On-Line Work Scheduling Process", Revision 4, dated April 21, 1998.
7. IP3-DBD-307, "Design Basis Document for the 480VAC, 125VDC, 120 Vital AC Electrical Distribution Systems, Revision 2, dated February 19, 1998.
8. IP3-CALC-00207, "480V Bus 2A, 3A, 5A & 6A and EDGs 31, 32 and 33 Accident Loading", Revision 6, dated October 30, 1997.
9. IP3 System Operating Procedure, SOP-EL-9, "Filling the Diesel Fuel Oil Storage Tanks", Revision 11, dated February 21, 1997.
10. IP2/IP3 Memorandum of Understanding, SSZ-94-01, No. 1, "Rules Governing The Use Of Electrical Supplies And Interties Between Consolidated Edison And The Power Authority", Revision 1, dated September 25, 1993.
11. IP2/IP3 Memorandum of Understanding, SSZ-94-01, No.7, "Rules Governing The Maintenance And Use Of A Dedicated (By Consolidated Edison For The Power Authority) Diesel Fuel Oil (No. 2) Supply", Revision 2, dated October 13, 1994.
12. RE-01-018, "IP3 – Evaluation of Fuel Oil Storage Tanks Extended Outage", dated January 23, 2001.
13. RE-01-029, "IP3 – Follow up to Evaluation of Fuel Oil Storage Tanks Outage", dated January 29, 2001.

ATTACHMENT III TO IPN-01-012

**MARKUP OF THE
PROPOSED CHANGE TO THE TECHNICAL SPECIFICATION
REGARDING ONE -TIME ALLOWED OUTAGE TIME ASSOCIATED
WITH ONE DIESEL GENERATOR OR ANY DIESEL FUEL OIL SYSTEM**

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
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6. Three batteries plus three chargers and the D.C. distribution systems operable.
7. No more than one 120 volt A.C. Instrument Bus on the backup power supply.
- B. The requirements of 3.7.A may be modified to allow any one of the following power supplies to be inoperable at any one time.

1. One diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 72 hours* provided the 138 KV and the 13.8 KV sources of offsite power are available, and the engineered safety features associated with the remaining diesel generator buses are operable. If the inoperable diesel generator became inoperable due to any cause other than preplanned maintenance or testing, then within 24 hours, either:

- a. Determine by evaluation, that the remaining operable diesel generators are not inoperable due to common-cause failure.

OR

- b. Verify by testing, that the remaining diesel generators are operable.

2. The 138 KV or the 13.8 KV sources of power may be inoperable for 48 hours provided the three diesel generators are operable. This operation may be extended beyond 48 hours provided the failure is reported to the NRC within the 48 hour period with an outline of the plans for restoration of offsite power and NRC approval is granted.

Each of 31, 32 or 33 emergency (EDG) (FOSTs) its associated
 * ~~32~~ diesel generator, fuel oil storage tanks, may be inoperable and the ~~32~~
 diesel generator may be declared technically inoperable, but available and
 capable of automatic start, for up to ¹⁴ ~~7~~ days, one-time ^{only} if needed, during
 2001 ~~1999 and prior to Refueling Outage RO-10~~. This condition may only be invoked
 to inspect/repair the ~~32~~ diesel fuel oil storage tank, if deemed necessary
 based on concerns with water in-leakage. The following additional
 requirements shall also be met to invoke this extended one-time allowed
 outage time: (1) performance of offsite power source switching or
 maintenance evolutions for technical specification required offsite power
 sources shall not be scheduled during ^{these 31 or 33} ~~this 32~~ FOST outages, and (2) ^{these 31 or 33} ~~this 32~~ or 33
 FOST outages shall not be scheduled during predicted severe weather.

ATTACHMENT IV TO IPN-01-012

**MARKUP OF SUBMITTED IMPROVED TECHNICAL SPECIFICATIONS (ITS)
TO INCLUDE THE PROPOSED TECHNICAL CHANGES REGARDING ONE-
TIME ALLOWED OUTAGE TIME ASSOCIATED WITH ONE DIESEL
GENERATOR OR ANY DIESEL FUEL OIL SYSTEM**

Affected Improved Technical Specification pages:

3.8.1-3

3.8.3-1

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO 50-286
DPR-64

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One DG inoperable.	B.1 Perform SR 3.8.1.1 for the offsite circuits.	1 hour
	<u>AND</u>	Once per 8 hours thereafter
	B.2 Declare inoperable the required features supported by the inoperable DG when its required redundant feature is inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2 for OPERABLE DGs.	24 hours
	<u>AND</u>	
	B.4 Restore DG to OPERABLE status.	72 hours*

(continued)

* Each of 31, 32 or 33 emergency diesel generator (EDG) fuel oil storage tanks (FOSTs) may be inoperable and its associated EDG may be declared technically inoperable, but available and capable of automatic start, for up to 14 days, one-time only if needed, during 2001 prior to August 31, 2001. This condition may only be invoked to inspect/repair each of 31, 32 or 33 EDG FOSTs once, if deemed necessary based on concerns with water in-leakage. The following additional requirements shall also be met for each FOST inspection/repair to invoke this extended one-time allowed outage time: (1) performance of offsite power source switching or maintenance evolutions for technical specification required offsite power sources shall not be scheduled during these 31, 32 or 33 FOST outages, and (2) these 31, 32 or 33 FOST outages shall not be scheduled during predicted severe weather.

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil and Starting Air

LC0 3.8.3 The stored diesel fuel oil and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. -----NOTE----- Only applicable in MODES 1, 2, 3 and 4. -----</p> <p>One or more DGs with usable fuel oil in associated DG fuel oil storage tank < 5365 gal.*</p>	<p>A.1 Declare associated DG inoperable.</p>	<p>Immediately</p>
<p>B. -----NOTE----- Only applicable in MODES 5 and 6 and during movement of irradiated fuel. -----</p> <p>Total combined usable fuel oil in DG fuel oil storage tanks associated with the operable DG(s) < 5365 gal.</p>	<p>B.1 Declare all DGs inoperable.</p>	<p>Immediately</p>

* If this condition is met due to a deliberate one-time inspection/repair, due to water-in-leakage, of 31, 32, or 33 EDG FOST, then the asterisk note of LC0 3.8.1.B.4. completion time applies. (continued)