

March 30, 2001

Mr. Michael Kansler  
Sr. Vice President and  
Chief Operating Officer  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING PROPOSED CHANGE TO  
ALLOWED OUTAGE TIME (TAC NO. MB1199)

Dear Mr. Kansler:

By letter dated February 14, 2001, you requested an amendment to the Technical Specifications to extend the allowed outage time for the emergency diesel generators and their associated fuel oil storage tanks from 72 hours to 14 days on a one-time basis. Before we can complete our review, we request that you respond to the enclosed questions. These questions were discussed with members of your staff in a teleconference on March 15, 2000. We understand that you intend to respond to our questions by May 1, 2001.

Sincerely,

***/RA/R Laufer for***

George F. Wunder, Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure: As stated

cc w/encl: See next page

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Valhalla, NY 10592

## REQUEST FOR ADDITIONAL INFORMATION

1. Provide the following information for the proposed one-time TS change, consistent with Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis":
2. Baseline (internal and external) Core Damage Frequency (CDF) and Large Early Release Frequency (LERF)
  - a. Change in CDF and LERF
  - b. Probabilistic Risk Analysis (PRA) quality assurance
  - c. Discussion of uncertainty in the analysis
3. Discuss measures, if any, which are currently, or will be, taken to prevent water from getting into the emergency diesel generator (EDG) fuel oil storage tanks (FOSTs).
  - a. How often are the FOSTs tested for water content?
  - b. If excessive water is found in one FOST, how will it be assured that the remaining FOSTs are operable? (Include discussion on fuel oil sampling/testing procedure.)
  - c. What measures, if any, would be taken to ensure that possible corrective maintenance work on one EDG FOST during the proposed Limiting Condition for Operation (LCO) will not cause additional impact on EDG Fuel Oil System (FOS) reliability, or the EDGs' system reliability otherwise?
4. Please provide a description of the EDG FOS configuration and expected operation, if required, during the proposed LCO.
5. Please provide the following information for the EDG FOS as it is currently modeled in the supporting PRA model: 1) system unreliability, 2) system success criteria, 3) independent and common cause failure (CCF) component unreliabilities (indicate if they are plant-specific or generic), 4) important operator actions modeled in the system fault tree. How is the EDG FOS unreliability changed given one EDG FOST unavailable as would be the case in the proposed LCO?
6. Discuss the fuel oil system's electrical dependencies on the EDGs.
7. Given any one the EDG FOSTs out of service, provide the dominant PRA model sequences for that configuration. Discuss risk insights gained and any measures that may be taken as a result.
8. Please provide the following from your supporting PRA model: 1) Risk Achievement Worth (RAW) for 1 and for 2 fuel oil transfer pumps, 2) RAW and the Fussler-Vessely importance measures for each EDG, and 3) the CCF probability for 2 of 3 EDGs.

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9. How do the current EDG unreliability values compare with the EDG unreliabilities assumed in the supporting PRA analysis (discuss failure to start on demand and failure to run frequency for each diesel)?
10. Are there currently any trends in any of the EDGs' reliability?
11. What system/train maintenance will not be planned during the proposed LCO per procedures?
12. Describe your configuration risk management process of planned and unplanned equipment outages during the proposed LCO, including use of the PRA model or other risk assessment tools.
13. Describe the latest updates to the PRA model that are relevant and important to your supporting PRA analysis of the proposed TS change, including changes that may have resulted from the August 31, 1999, partial loss of offsite power event at Indian Point 2.