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February 22, 1985
CD-LIS-85-152
Project 1816

Director
Division of Rules and Records
U.S. N.R.C.
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-85-129
Rec'd 2-26-85

Dear Sir:

This is a Freedom of Information Act request for the following document
to be placed in the Public Document Room:

Enclosures to NRC letter to New York Power Authority (50-286)
concerning Redundant Decay Heat Removal Capability Technical
Specifications dated October 15, 1984. (accession no. 8412120493)

If clarification is needed, please call me at (813) 796-2264. Thank you
for your assistance.

Sincerely,

Lyle Graber

Lyle Graber
Licensing Engineer
Licensing Information Service

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 15, 1984

Docket No. 50-286

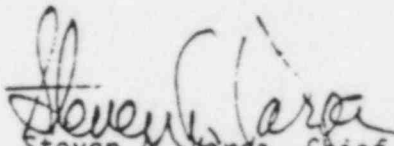
Mr. J. P. Bayne, Executive Vice
President - Nuclear Generation
Power Authority of the State of New York
123 Main Street
White Plains, New York 10601

Dear Mr. Bayne:

SUBJECT: REDUNDANT DECAY HEAT REMOVAL CAPABILITY TECHNICAL SPECIFICATIONS

By letter dated February 14, 1984, you requested revision to the Technical Specifications for the Indian Point Unit No. 3 with regard to the decay heat removal requirements. The NRC staff has reviewed your submittal and concludes that additional information is needed for the staff to complete the review. The request for the needed additional information is enclosed. Your response is requested within 45 days of receipt of this letter.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required Under P.L. 96-511.


Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

~~8412120493 PDR~~
7pp

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REACTOR SYSTEMS BRANCH
REQUEST FOR ADDITIONAL INFORMATION
INDIAN POINT UNIT NO. 3
DOCKET NO. 50-286

1. During startup and power operations, the Standard Technical Specifications (STS) require all reactor coolant loops to be operating, otherwise the plant must be brought to at least the hot standby mode within one hour. The STS also require verification of reactor coolant loop operation on a 12 hour basis. The intent of the STS requirement is to ensure the RC pumps and other associated equipment are monitored to detect degrading performance and safe plant operation. In your response to this item, you indicated that the reactor should not be operated at power above 10% rated power with less than 4 reactor coolant loops in operation, and when the reactor is critical and above 2% rated power, at least two RC pumps shall be in operation, which is supported by the analyses provided in Indian Point 3 FSAR that reactor heat equivalent to 10% of rated power can be removed with natural circulation. Thus the Indian Point 3 Technical Specifications requirements meets part of the STS intent, i.e., heat removal capability. However, the Indian Point 3's Technical Specifications (TS) do not have the above surveillance requirement and action item or their equivalent. Provide justification to demonstrate why the action item and the surveillance requirement are not necessary. For example, cite other surveillance procedures that would meet the STS's intent, otherwise propose suitable technical specifications meeting the STS intent.

2. For hot standby operation the STS require that at least two reactor coolant loops shall be operable, including their associated RC pump and SGs and at least one of the RC loops to be operating. If these conditions are not met and corrective actions cannot restore the required loops to operable status within 72 hours, the reactor is to be in the hot shutdown mode within the next 12 hours. Boron dilution operations are to be stopped if a RC loop is not operating. In your response you indicate that only one RC pump is required to be operating for hot standby mode operation. Your TS do not specify that two RC loops must also be operable. Discuss how Indian Point 3 decay heat removal capability can meet the single failure criteria for the hot standby mode operation. We also point out that if your safety analyses (particularly rod withdrawal) assume 2 pumps are operational, your tech spec is also inconsistent with the safety analyses and should be corrected.

The STS also require periodic verification of the RC pump's operability once every 7 days; verification of the steam generator's operability once every 12 hours; and verification that at least one RC loop is operating once every 12 hours. The Indian Point 3 TS do not have these surveillance requirements. Provide justification as to why surveillance requirements are not necessary or propose suitable modifications to your Technical Specifications to meet the STS intent.

3. The STS for the hot shutdown mode require at least two loops that are capable of removing decay heat to be operable. Either two reactor coolant loops (including their associated SGs and at least one associated RC pump) or the two RHR loops or one of each loop must be operable, and one of the above loops must be operating. The STS further require that if the above conditions are not met and immediate corrective actions cannot restore the required loops to operable status, the reactor is to be in the cold shutdown mode within 24 hours and no boron dilution operations should take place if a reactor coolant loop is not operating. The Indian Point 3 TS meet all these requirements.

The STS also require periodic verification of the RC pump's operability once per 7 days; verification of the steam generator operability once per 12 hours; and verification that at least one RC loop or RHR loop is operating once every 12 hours. The Indian Point 3 TS do not have these surveillance requirements.

Provide justification as to why these surveillance requirements are not needed, or propose suitable modifications to your Technical Specification.

4. For the cold shutdown mode ($T_{ave} \leq 200^{\circ}\text{F}$), the STS require that either two RHR loops be operable and one of the loops to be operating. Otherwise, immediate corrective action must be initiated to

restore the require loops to operable status. The STS also require that any boron dilution operation be suspended if no RHR loop is operating. The STS further require that RHR operation be verified once every 12 hours. The Indian Point 3 TS do not explicitly require one RHR loop to be operating for cold shutdown mode operation. The TS also do not have the surveillance requirement to verify RHR operation. Provide justification as to why limiting condition for cold shutdown mode operation and the surveillance requirements are not included in the Indian Point TS, or propose suitable modifications to your Technical Specification.