

March 4, 1987

Docket No. 50-247

Mr. Murray Selman
Vice President, Nuclear Power
Consolidated Edison Company
of New York, Inc.
Broadway and Bleakley Avenue
Buchanan, New York 10511

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<u>Docket File</u>	NRC PDR	Local PDR
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N. Thompson	T. Barnhart (4)	
ACRS (10)	OPA	LFMB

Dear Mr. Selman:

SUBJECT: TECHNICAL EXEMPTION FROM THE REQUIREMENTS OF 10 CFR 50
APPENDIX R FOR THE INDIAN POINT NUCLEAR GENERATING UNIT 2

By letter dated July 13, 1983 you requested an exemption from the technical requirements of Section III.G.2 of Appendix R to 10 CFR 50 for the Charging Pump room, Residual Heat Removal Pump room and Auxiliary Boiler Feedwater Pump room redundant heating, ventilation, and air conditioning (HVAC) exhaust fans to the extent that the HVAC circuits are not separated and protected in accordance with the requirements of Section III.G.2 of Appendix R to 10 CFR 50. By letters dated December 7, 1984, January 10, 1986 and December 17, 1986 you provided additional information with regard to this exemption request. Enclosure 1 grants the exemption request.

A copy of the notice of exemption is being filed with the Office of the Federal Register for publication.

Sincerely,

151
Steven A. Varga, Director
Project Directorate #3
Division of PWR Licensing-A

Enclosure:
As stated

cc: See next page

*SEE PREVIOUS CONCURRENCE

PD#3	PD#3	OGC	PD#3	DIR:DIV.
CVogan*	MSlosson*	*	SVarga*	TNovak*
2/4/87	2/1/87	2/10/87	2/17/87	3/4/87

3/4/87

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A copy of the notice of exemption is being filed with the Office of the Federal Register for publication.

Sincerely,

Steven A. Varga, Director
Project Directorate #3
Division of PWR Licensing-A

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As stated

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APPENDIX R FOR THE INDIAN POINT NUCLEAR GENERATING UNIT 2

By letter dated July 13, 1983 you requested an exemption from the technical requirements of Section III.G.2 of Appendix R to 10 CFR 50 for the redundant primary auxiliary building and auxiliary feedwater pump room heating, ventilation, and air conditioning (HVAC) exhaust fans to the extent that the HVAC circuits are not separated and protected in accordance with the requirements of Section III.G.2 of Appendix R to 10 CFR 50. By letters dated December 7, 1984, January 10, 1986 and December 17, 1986 you provided additional information with regard to this exemption request. Enclosure 1 grants the exemption request concerning emergency lighting.

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Steven A. Varga, Director
Project Directorate #3
Division of PWR Licensing-A

Enclosure:
As stated

cc: See next page

PD#3 W
CVogan
2/4/87

PD#3 MS
MSlosson
2/1/87

OGC
W. Shields
2/1/87

PD#3
SVarga
2/1/87

DIB-DIV.
TNovak
3/4/87

Mr. Murray Selman
Consolidated Edison Company
of New York, Inc.

Indian Point Nuclear Generating
Station 1/2

cc:

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Environmental Protection Bureau
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New York, New York 10047

Docket No. 50-247

(Indian Point Nuclear
Generating Unit No. 2)

EXEMPTION

I.

Consolidated Edison Company of New York (the licensee) is the holder of Facility Operating License No. DPR-26 which authorizes operation of the Indian Point Nuclear Generating Unit No. 2 (IP-2). This license provides, among other things, that it is subject to all rules, regulations and Orders of the Commission now or hereafter in effect.

The facility consists of one pressurized water reactor at the licensee's site located in Westchester County, New York.

II.

On November 19, 1980, the Commission published a revised Section 10 CFR 50.48 and new Appendix R to 10 CFR 50 regarding the fire protection features of nuclear power plants (45 FR 76602). The revised Section 50.48 and Appendix R became effective on February 17, 1981. Section 50.48(c) established the schedules for satisfying the provisions of Appendix R. Section III of Appendix R contains fifteen subsections, lettered A through O, each of which

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specifies requirements for particular aspects of the fire protection features at a nuclear power plant. One of the fifteen subsections, III.G, is the subject of this exemption request.

By letter dated July 13, 1983, the licensee requested an exemption from Section III.G.2 of Appendix R to the extent that it requires that one train of cables and equipment necessary to achieve and maintain safe shutdown be maintained free of fire damage by one of the following means:

- (1) Separation of cables and equipment and associated non-safety circuits of redundant trains by a fire barrier having a 3-hour rating. Structural steel forming a part of or supporting such fire barriers shall be protected to provide fire resistance equivalent to that required of the barrier;
- (2) Separation of cables and equipment and associated non-safety circuits of redundant trains by a horizontal distance of more than 20 feet with no intervening combustibles or fire hazards. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area; or
- (3) Enclosure of cable and equipment and associated non-safety circuits of one redundant train in a fire barrier having a 1-hour rating. In addition, fire detectors and an automatic fire suppression system shall be installed in the fire area.

1.0 CHARGING PUMP ROOMS (FIRE ZONE 5,6,7); RHR PUMP ROOMS (FIRE ZONE 3 AND 4);
AUXILIARY BOILER FEED PUMP ROOM (FIRE ZONE 23)

1.1 Exemption Requested:

The licensee requested an exemption from Section III.G.2 of Appendix R to 10 CFR 50 to the extent that it requires separation of redundant HVAC exhaust

fans by 20 feet, 3-hour fire barriers, or enclosing one train in a fire barrier having a 1-hour rating.

1.2 Discussion and Evaluation:

In lieu of providing separation or fire barriers for the redundant HVAC exhaust fans required to support safe shutdown in the charging pump rooms and RHR pump rooms, the licensee has proposed providing a portable exhaust unit as an alternate room cooling method. Initiation of the exhaust fan would not be required for approximately two hours or longer following a reactor trip. The exhaust fan is stored onsite and operating procedures have been revised to incorporate its use. The procedures are included in the operator training/retraining program.

Similarly, in lieu of providing separation or fire protection for cabling to the auxiliary boiler feed pump (ABFP) room exhaust fans, the licensee proposed to open a rollup door as an alternative for ensuring the necessary cooling for safe shutdown equipment in the event the exhaust fans are lost. The licensee provided the room temperature profile for 48 hours following the loss of the ventilation exhaust fans with the rollup door both open and closed. The analysis indicated that the ABFP room temperature does not exceed 106°F with the rollup door open. A temperature of 120°F can be tolerated without damage to safe shutdown equipment. Plant operating procedures have been revised to instruct the operators on when to open the ABFP room rollup door. These procedures are included in the operator training/retraining program.

1.3 Conclusions

Based on our review of the licensee's proposed alternative cooling methods, we conclude that the level of fire safety in the Charging Pump Rooms, the RHR Pump Rooms and the Auxiliary Boiler Feed Pump Room is equivalent to that achieved by compliance with the technical requirements of Appendix R; and, therefore, the licensee's request for exemption in these areas should be granted.

By letter dated December 17, 1986, the licensee provided information relevant to the "special circumstances" finding required by revised 10 CFR 50.12(a) (see 50 FR 50764). The licensee stated that providing alternate cooling methods accomplishes the underlying purpose of the rule. Implementing additional modifications to provide more suppression systems, detection systems, physical separation and/or fire barriers would require expenditures of engineering and construction resources as well as the associated capital costs which would represent an unwarranted burden on the licensee. In many of the rooms under consideration, exemptions have already been granted from Section III.G.2 or III.G.3 requirements for the safe shutdown equipment itself by letter dated October 16, 1984. This exemption involves a support system for this equipment. The licensee stated the implementation of additional modifications would result in expenditures that are significantly in excess of those contemplated when the regulation was adopted and those required to meet the underlying purpose of the rule. The staff concludes that "special circumstances" exist for the licensee's requested exemption in that the application of the regulation in these particular circumstances is not necessary to achieve the underlying purposes of Appendix R to 10 CFR Part 50 (See 10 CFR 50.12(a)(2)(ii)).

III.

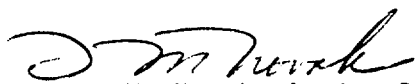
Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12(a), (1) these exemptions as described in Section II are authorized by law and will not present an undue risk to the public health and safety, and are consistent with the common defense and security and (2) special circumstances are present for the exemptions in that application of the regulation in these particular circumstances is not necessary to achieve the underlying purposes of Appendix R to 10 CFR Part 50. Therefore, the Commission hereby grants the following exemption from the requirements of Section III.G of Appendix R to 10 CFR Part 50:

Charging Pump Rooms (Fire Zone's 5,6,7); RHR Pump Rooms (Fire Zones 3,4) and Auxiliary Boiler Feed Pump Room (Fire Zone 23) to the extent that redundant HVAC exhaust fans are not separated by 20 Feet, 3-hour fire barriers pursuant to III.G.2.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of these exemptions will have no significant impact on the environment (52 FR 5509).

This exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Thomas M. Novak, Acting Director
Division of PWR Licensing-A

Dated at Bethesda, Maryland
this 4th day of March 1987.