

J. Phillip Bayne  
Executive Vice President  
Nuclear Generation

August 16, 1984  
IPN-84-32

Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Appendix R Fire Protection Program

- References:
- (1) Letter dated May 20, 1983, IPN-83-44,  
J. P. Bayne to S. A. Varga
  - (2) Letter dated July 22, 1983, S. A. Varga to  
J. P. Bayne
  - (3) Letter dated September 26, 1983, IPN-83-80,  
J. P. Bayne to S. A. Varga
  - (4) Letter dated December 13, 1983, IPN-83-99,  
J. P. Bayne to S. A. Varga
  - (5) Letter dated February 2, 1984, D. G.  
Eisenhut to J. P. Bayne
  - (6) Letter dated June 15, 1984, IPN-84-18,  
J. P. Bayne to S. A. Varga
  - (7) Letter dated August 13, 1984, IPN-84-29,  
J. P. Bayne to S. A. Varga

Dear Sir:

By letter dated September 26, 1983 (Reference 3) the Authority informed the NRC of the establishment of an Appendix R Task Force and the initiation of a comprehensive review and re-evaluation of Indian Point 3 compliance with 10 CFR 50, Appendix R, Sections III.G, III.J, III.O and III.L. The scope of the Authority's activities included, but was not limited to, the specific areas of concern identified in the draft Safety Evaluation Report enclosed with Reference 2.

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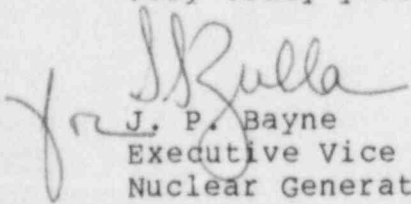
This letter and its attachments summarize the results of the Authority's re-evaluation of Indian Point 3 compliance with Sections III.G and III.L of Appendix R. Issues related to compliance with Section III.O requirements have been addressed in Reference 7. With respect to Section III.J, it should be noted that implementation of modifications to achieve III.G or III.L compliance might necessitate modification of the emergency lighting system. Thus full compliance with Section III.J can only be attained subsequent to completion of design changes required for compliance with Section III.G, or Section III.L, or both.

The attached report describes in detail existing and proposed capabilities which provide or will provide an equivalent level of fire protection to that dictated by verbatim compliance with Section III.G. Included in the report (Section 6) are four requests for exemption from the literal requirements of the regulation. Modifications necessary to support the aforementioned exemption requests or to achieve full compliance in specified plant locations are described in Section 5 of the report.

Implementation of the various modifications will require a significant engineering and design effort by the Authority and/or its contractors. In order to coordinate implementation of the necessary modifications with scheduled plant outages, the Authority requests an exemption, pursuant to Sections 50.12, 50.48(c) and 50.48(d) of 10 CFR, to the schedular requirements of Section 50.48(c) and 50.48(d) to allow for final completion of all plant modifications prior to startup from the next (cycle 4/5) refueling outage. As shown in Attachment 1, intermediate implementation dates have been developed for modifications which can either be performed during power operations or during the mid-cycle steam generator inspection outage, scheduled to begin in mid-October, 1984. The design and implementation of these modifications are ongoing efforts. Portions of these modifications are being/will be performed prior to the dates indicated in the schedule. Intermediate implementation dates for items 17, 18 and 19 will be provided by September 11, 1984.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,

  
J. P. Bayne  
Executive Vice President  
Nuclear Generation

cc: attached

cc: Resident Inspector's Office  
Indian Point Unit 3  
U. S. Nuclear Regulatory Commission  
P. O. Box 66  
Buchanan, New York 10511

Attachment 1 to IPN-84-32  
Proposed Schedule for Implementation  
of Appendix R Modifications

New York Power Authority  
Indian Point Unit 3  
Docket No. 50-286

Schedule for Completed Implementation of Appendix R Modifications

<u>Modification</u>	<u>Schedule</u>
(1) Provide local indication of main steam pressure in the vicinity of the atmospheric dump valves.	mid-cycle outage
(2) Provide local indication of N <sub>2</sub> pressure (to the main steam atmospheric dump valves) and relocate a N <sub>2</sub> bottle, with quick disconnects, to the dump valve area.	mid-cycle outage
(3) (a) Develop repair procedures and training to facilitate necessary post-fire actions (e.g. repair of RHR pump power cable).	September 15, 1984
(b) equipment (kits) available on site.	September 15, 1984
(4) Provide for local operation and control of the 480v switchgear breaker for the no. 33 motor driven auxiliary feedwater pump.	mid-cycle outage
(5) Install an area-wide automatic suppression system in the auxiliary feedwater pump room.	mid-cycle outage
(6) Review and upgrade, as necessary, all fire area boundaries and internal barriers credited in the analysis to ensure adequate fire rating.	review ongoing; upgrade where required, as permitted by operational restrictions (final implementation by cycle 4/5 refueling outage)
(7) Installation of radiant energy shields/wraps inside containment.	mid-cycle outage
(8) Provide a one hour-rated wrap around source range (N31) conduit from the electrical penetration (outside VC to a minimum of twenty feet into the upper electrical tunnel.	mid-cycle outage
(9) Provide a one hour-rated wrap/barrier around the trays containing required instrumentation in the electrical penetration area.	mid-cycle outage

<u>Modification</u>	<u>Schedule</u>
(10) Complete installation of an alternate shutdown diesel generator.	cycle 4/5 refueling outage
(11) Complete installation of a source range flux channel independent of the cable spreading room.	cycle 4/5 refueling outage
(12) Provide isolation capability for wide-range RCS pressure instrumentation at the electrical penetration area with local readouts at the AFW and charging control stations.	cycle 4/5 refueling outage
(13) Provide isolation capability for wide-range RCS temperature instruments at the electrical penetration area with local readouts at the AFW control station.	cycle 4/5 refueling outage
(14) Provide a partial-height non-combustible barrier to protect CCW pump no. 33. Wrap the power cable for CCW pump no. 33.	October 31, 1984
(15) Reroute one channel each of wide range steam generator level (LT-447D) and pressurizer level (LT-462).	mid-cycle outage
(16) Relocate the three air operated valves in the steam supply line to the auxiliary feedwater pump turbine (1310A, 1310B, and PCV 1139).	cycle 4/5 refueling outage
(17) Modify the door between the cable tunnels and the cable spreading room so that the door closes on indication of a tunnel fire.	*
(18) Extension of automatic detection systems in various fire areas.	*
(19) Modify as necessary the hatchway at the end of the upper electrical tunnel.	*

\* Intermediate implementation dates will be provided by September 11, 1984 but in all cases the modifications will be implemented by the end of the cycle 4/5 refueling outage.



Attachment 2 to IPN-84-32  
Reevaluation of Appendix R Section III.G  
Requirements for Indian Point Nuclear Power Plant Unit 3

New York Power Authority  
Indian Point Unit 3  
Docket NO. 50-286