

October 8, 2004

Mr. Fred Dacimo
Site Vice President
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 - NOTIFICATION OF
CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION

Dear Mr. Dacimo:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region I staff will conduct a triennial fire protection baseline inspection at the Indian Point Nuclear Generating Unit No. 3 starting in January, 2005. The inspection team will be led by Mr. Keith Young, a senior reactor inspector from the NRC Region I Office. The team will be composed of NRC personnel. The inspection will be conducted in accordance with IP 71111.05, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit - Week of December 6, 2004
- Onsite inspection - Weeks of January 10 and January 24, 2005

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the Indian Point Unit 3 fire protection programs, fire protection features, and post-fire safe shutdown capabilities and plant layout, and, as necessary, obtain plant specific site access training and badging for unescorted site access. The types of documents the team may be interested in reviewing, and possibly obtaining, are listed in Enclosure 1. The inspection team leader will contact you with specific document requests and inform you of plant areas for inspection focus.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access (including radiation protection training, security and safety); and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Indian Point Unit 3 fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems and features, and the Indian Point Unit 3 fire protection program and its implementation.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Mr. Keith Young, the team leader, in the Region I Office at (610) 337-5293 or by e-mail at KAY@nrc.gov.

Sincerely,

/RA/

John F. Rogge, Chief
Electrical Branch
Division of Reactor Safety

Docket No. 50-286
License No. DPR-64

Enclosure: List of Reactor Fire Protection Program Supporting Documents

cc w/enclosure:

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M. R. Kansler, President - Entergy Nuclear Operations, Inc.
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T. Walsh, Secretary, NFSC, Entergy Nuclear Operations, Inc.
D. O'Neill, Mayor, Village of Buchanan
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R. Albanese, Executive Chair, Four County Nuclear Safety Committee
S. Lousteau, Treasury Department, Entergy Services, Inc.
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Chairman, Standing Committee on Environmental Conservation, NYS Assembly
Chairman, Committee on Corporations, Authorities, and Commissions
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B. Brandenburg, Assistant General Counsel
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Assemblywoman Sandra Galef, NYS Assembly
County Clerk, Westchester County Legislature
A. Spano, Westchester County Executive
R. Bondi, Putnam County Executive
C. Vanderhoef, Rockland County Executive
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T. Judson, Central NY Citizens Awareness Network
M. Elie, Citizens Awareness Network
D. Lochbaum, Nuclear Safety Engineer, Union of Concerned Scientists
Public Citizen's Critical Mass Energy Project
M. Mariotte, Nuclear Information & Resources Service
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L. Puglisi, Supervisor, Town of Cortlandt
Congresswoman Sue W. Kelly
Congresswoman Nita Lowey
Senator Hillary Rodham Clinton
Senator Charles Schumer
J. Riccio, Greenpeace
A. Matthiessen, Executive Director, Riverkeeper, Inc.
M. Kaplowitz, Chairman of County Environment & Health Committee
A. Reynolds, Environmental Advocates
M. Jacobs, Director, Longview School
D. Katz, Executive Director, Citizens Awareness Network
P. Gunter, Nuclear Information & Resource Service
P. Leventhal, The Nuclear Control Institute
K. Coplan, Pace Environmental Litigation Clinic
R. Witherspoon, The Journal News
W. DiProfio, PWR SRC Consultant
D. C. Poole, PWR SRC Consultant
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W. Little, Associate Attorney, NYSDEC
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Mr. Fred Dacimo

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NAME	KYoung		JRogge					
DATE	09/30/04		10 /06/04					

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Reactor Fire Protection Program Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. The current version of the Fire Protection Program and Fire Hazards Analysis.
2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade, technical requirements manual).
3. Fire brigade training program and pre-fire plans.
4. Post-fire safe shutdown analysis, including systems and separation analysis, as well as alternative shutdown analysis.
5. Piping and instrumentation (flow) diagrams for fire protection suppression systems.
6. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
7. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
9. Plant layout drawings which identify the general location of the post-fire emergency lighting units.
10. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, and procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room (or any other alternative shutdown area).
11. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
12. Maintenance procedures which routinely verify fuse and circuit breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
13. Significant fire protection and post-fire safe shutdown related design change packages (including the associated 10 CFR 50.59 evaluations) and Generic Letter 86-10 evaluations.

Enclosure

14. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information associated with fires.
15. Procedures/instructions that govern the implementation of plant modifications, temporary modifications, maintenance, and special operations, and their impact on fire protection.
16. Organization charts of site personnel down to the level of fire protection staff personnel.
17. Listing of plant fire protection licensing basis documents (i.e., a listing of the SERs and change evaluations which form the licensing basis for the reactor plant's post-fire safe shutdown configuration).
18. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
19. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations (i.e, a listing of the NFPA code versions committed to (NFPA codes of record)).
20. A listing of all open condition reports associated with fire protection or Appendix R safe shutdown issues (problem reports/NCRs/EARs/problem identification and resolution reports).
21. A listing of condition reports associated with fire protection or Appendix R safe shutdown issues (problem reports/NCRs/EARs/problem identification and resolution reports) that have been closed within the last three years.
22. The three most recent fire protection QA audits and/or fire protection self-assessments.
23. Copies of QA surveillances of fire protection activities performed in the last three years.
24. Electrical one-line drawings showing the power supplies (normal and emergency) for hot standby and cold shutdown equipment (including instrumentation and control circuits necessary for safe shutdown).
25. Documentation demonstrating how Indian Point Unit 3's PRA copes with a RCP seal LOCA and does it conform to the latest Westinghouse guidance. Also, include how this guidance is implemented into Indian Point Unit 3's safe shutdown procedures. Provide information regarding the licensing basis for RCP seal leakage rates, vendor information regarding RCP seal type (high temperature seals or pre-high temperature seals), manufacturers design information which states what leak-off rates may actually be and assurance of how adequate makeup capability is protected and available to compensate for any leakage or seal failure. Also, provide documentation that demonstrates makeup capability exceeds the RCP seal leak-off rate to ensure that pressurizer level is maintained in the indicating range.
26. Fire Protection system health reports (last two).