



Corbin A. McNeill
Senior Vice President
Nuclear Generation

March 15, 1985
IPN-85-10

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 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
Containment Venting and Purging

Dear Sir:

This letter serves to respond to your December 17, 1984 letter, which transmitted the safety evaluation report concerning containment venting and purging at Indian Point 3.

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating License," together with forty (40) copies of Attachment I and II thereto, comprising the appropriate revision to the affected Technical Specifications pages and the associated Safety Evaluation. This application seeks to amend Appendix A, Section 3.5, "Instrumentation Systems", Section 3.6, "Containment System", and Section 4.13, "Containment Vent and Purge System".

The Authority's July 7, 1982 letter stated that modifications are required to strengthen portions of the containment purge and vent system ductwork to protect against the effects of a LOCA. As a result of the installation of three supports, the vent system is currently capable of withstanding the effects of a LOCA. The Authority will evaluate the cost-effectiveness of implementing the modifications needed to strengthen the purge system ductwork. Consequently, the Authority will defer addressing the issue of containment purging at power to a later date. As the Authority intends to continue utilizing the venting system to control containment pressure during normal operations, the concerns identified in the safety evaluation report germane to the venting system are being addressed hereinafter.

By letters dated May 19, 1983 and July 7, 1982, the Authority transmitted information demonstrating the ability of the purge and vent valves to function against accident containment pressures provided the valves are limited to a 60° open angle (90° = full open). Enclosure 2 to your December 17, 1984 letter requests appropriate Technical Specifications to assure that the opening angle is limited to 60° or less when operating with the reactor coolant temperature above 200°F. Proposed Technical Specifications limiting the opening angle of the vent valves and verifying that the purge valves are closed, are presented in Attachment I.

8503190072 850315
PDR ADOCK 05000286
P PDR

Rec'd w/ check \$150.00
150 339

A034
11

Mr. Steven A. Varga
March 15, 1985
Page 2

The containment vent system isolation circuitry will initiate valve closure upon receipt of a high radiation signal from the containment air particulate monitor R-11, the containment radioactive gas monitor R-12, or the plant vent iodine activity monitor R-28. As noted in the Authority's October 23, 1980 letter, the radiation monitoring instrumentation for containment ventilation system isolation is not safety grade. The supplement to Enclosure 3 of your December 17, 1984 letter states that the automatic radiation isolation signal to the containment purge and vent isolation valves need not originate from a safety grade radiation monitoring system provided reasonable provisions are included in the Technical Specifications dealing with equipment operability and testability. As the R-28 monitor samples the plant vent environment, it will not sense a high containment radiation condition prior to the R-11 and R-12 monitors initiating containment ventilation isolation. Therefore, the Authority only takes credit for the R-11 and R-12 monitors to sense a high containment radiation condition. Technical Specification 3.5 provides the limiting conditions for operation for the radiation monitors R-11 and R-12. Technical Specification 4.1 provides the surveillance requirements for the area radiation monitoring system.

The design of the containment ventilation system utilizes a Weld Channel and Containment Penetration Pressurization System (WCCPPS) to continuously pressurize the space between the isolation valves. If the pressure between the containment isolation valves falls below a set value, the "V.C. Ventilation Duct Loss of Pressurization" alarm will annunciate in the control room. Therefore, the WCCPPS serves as a continuous on-line monitoring system to detect leakage of the containment ventilation system isolation valves. As per Technical Specification 4.4.E, the containment ventilation system isolation valves are leakage tested as part of the WCCPPS test at intervals no greater than two years.

Enclosure 3 to your December 17, 1984 letter addresses the concern that automatic closure of the containment vent and purge isolation valves will not occur if the Engineered Safety Features (ESF) actuation signals are either inadvertently manually overridden or blocked. During normal operations, an initial ESF actuation signal cannot be blocked from the logic circuitry. However, in order to gain manual control of the safety system, the operator can block a continuously present ESF actuation signal, as per procedure. Since the logic circuitry design, as described in Enclosure 1 to this letter, necessitates a number of deliberate operator actions required to re-open the vent and purge system isolation valves subsequent to containment ventilation isolation, the possibility of an inadvertent blocking of an ESF actuation signal leading to a radioactive release via the containment vent and purge system is extremely remote. As such, the Authority considers that the existing status lights provide an adequate indication to the operators of an ESF actuation signal block.

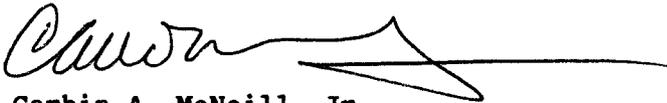
As per 10 CFR 170.12, enclosed is a check in the amount of \$150.00 in payment of the application fee for the review of these proposed changes to the Technical Specifications.

Mr. Steven A. Varga
March 15, 1985
Page 3

In accordance with the requirements of 10 CFR 50.91, a copy of this application for amendment to the Operating License and the associated attachment is being submitted to the designated New York State Official.

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

Very truly yours,



Corbin A. McNeill, Jr.
Senior Vice President
Nuclear Generation

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

Jay D. Dunkleberger, Director
Technology Development Programs
New York State Energy Office
2 Rockefeller Plaza
Albany, New York 12223