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October 17, 1985
IPN-85-55

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
Proposed Change to the Operating License

References: 1) Letter from J.C. Brons to S.A. Varga, dated September 10, 1985 entitled: "NUREG-0737, Item III.D.3.4, 'Control Room Habitability'".

2) Letter from S.A. Varga to L.W. Sinclair, dated March 18, 1983 entitled: "Order Confirming License Commitments on Post-TMI Related Issues."

3) Letter from H.L. Thompson, Jr. to J.C. Brons, dated September 27, 1985.

Dear Sir:

On September 10, 1985, (Reference 1), the Authority requested an extension to the March 18, 1983 Confirmatory Order (Reference 2) regarding the implementation of the requirements of NUREG-0737, Item III.D.3.4., "Control Room Habitability." By letter dated September 27, 1985 (Reference 3), the NRC requested the Authority submit an Application for Amendment to the Operating License in order to modify the schedular requirement. This letter transmits the requested Application for Amendment to the Operating License which seeks an extension in the completion schedule for this item.

Prior to issuance of the Confirmatory Order, a Toxic Gas Monitoring System was designed. Installation was completed during the Cycle 3/4 refueling outage. Subsequent to the Confirmatory Order, the Authority contracted with Stone and Webster Engineering Company (S&W) to perform a probabilistic analysis of onsite and offsite chemical releases and their effects on control room habitability. Concurrently, the Authority designed and procured additional toxic gas monitors to be installed during the cycle 4/5 refueling outage.

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The S&W analysis, submitted as part of Reference 1, concluded that neither the offsite toxic chemicals (chlorine and anhydrous ammonia) nor the onsite stored chemical of CO_2 pose a credible hazard to the control room operators.

This analysis was performed in accordance with the recommendations of Regulatory Guide 1.78 in addition to the guidelines of (Standard Review Plan) Section 2.2.3.

Enclosure 1 contains for filing three (3) signed originals and nineteen (19) copies of an "Application for Amendment to the Operating License," together with forty (40) copies of Attachment I and II thereto comprising a statement of the proposed changes to the Operating License and associated Safety Evaluation. The proposed changes are Attachment I to the application for amendment, while the associated Safety Evaluation is Attachment II.

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 operating license.

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

The NRC's safety evaluation with regard to III.D.3.4, dated January 27, 1982 stated the need for an additional radiation monitor and damper in the outside makeup air intake. The Authority contracted with United Engineers and Constructors (UE&C) to perform an analysis of IP-3 Control Room Habitability during an IP-2 LOCA using the existing area radiation monitor R-1. This analysis shows that the R-1 alarm setpoint will automatically switch the control room ventiliation system over to the Incident Mode before the dose guidelines of General Design Criterion 19 are exceeded.

The IP-3 Control Room also has fixed gaseous and particulate monitors installed. The particulate monitor is designated R-32; the gaseous monitor is R-33. These monitors alarm in the Control Room so the operator can take manual action to isolate the Control Room. These monitors are on a separate instrument bus from radiation monitor R-1.

It should also be noted that Consolidated Edison's Emergency Plan Procedures for IP-2 require that the IP-3 Control Room will be notified by the IP-2 Control Room in the event of a declaration of an Unusual Event, Alert, Site Area Emergency or General Emergency. The IP-3 Control Room operators have the ability to place the Control Room ventiliation system in the Incident Mode upon such notification.

The existing IP-3 control room ventilation damper A is automatically closed on a radiation signal and is closed remote-manually from the control room after an alarm for toxic gas. The damper is designed and manufactured to fail closed and can be closed manually, if necessary. Furthermore, during the cycle 4/5 refueling outage an additional local-manually operated damper has been installed.

Therefore, based on the above, the Authority believes that the requirements for Control Room Habitability with regard to radiation exposure have been met for IP-3.

The Authority is enclosing for your review the UE&C report (Enclosure 2), dated May 23, 1985, which evaluates IP-3 Control Room Habitability during an IP-2 LOCA.

If you have any questions regarding the proposed changes, please contact Mr. P. Kokolakis of my staff.

John C Brons

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ENCLOSURE 1

APPLICATION FOR AMENDMENT TO THE OPERATING LICENSE

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286