



John C. Brons
Senior Vice President
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October 31, 1986
IPN-86-54

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

Attention: Mr. Steven A. Varga, Director
PWR Project Directorate No. 3
Division of PWR Licensing-A

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Additional Information Regarding Appendix R Exemption
Requests Submitted In Accordance With 10 CFR 50.12.

- Reference:
1. Letter from Mr. J.P. Bayne to Mr. S.A. Varga submitting report, "Reevaluation of Appendix R Section III.G Requirements for Indian Point 3," dated August 16, 1984.
 2. Letter from Mr. J.C. Brons to Mr. S.A. Varga, "Exemption for Battery Powered Lights in the Yard Area," dated June 14, 1985.
 3. Letter from Mr. J.C. Brons to Mr. S.A. Varga, "Information to Support the Evaluation of IP-3 to 10 CFR 50.48 and Appendix R to 10 CFR 50," dated September 19, 1985.

Dear Mr. Varga:

The purpose of this letter is to provide information relevant to the "special circumstances" finding required by revised 10 CFR 50.12(a) (50 FR 50777). This information applies to the Appendix R exemption requests which were submitted by the referenced letters prior to the most recent revision of 10 CFR 50.12(a).

The Authority reaffirms its previous conclusion that the existing and proposed fire protection features described in the referenced exemptions provide an adequate level of fire safety. These features ensure that at least one train of safe shutdown systems remains free of fire damage as required by the Appendix R rule. Providing additional suppression systems, detection

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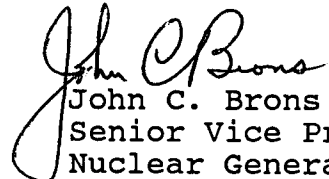
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systems, and fire barriers would require unwarranted expenditure of engineering and construction resources to implement the modifications listed in Attachment A.

Attachment A provides additional information for previously submitted relief requests. This information is being supplied at the request of the NRC. Fees pursuant to 10 CFR 170 are not included with this submittal as the application fee for exemption requests associated with our Appendix R Reevaluation of Reference (1) was transmitted by letter dated January 8, 1985.

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

Very truly yours,


John C. Brons
Senior Vice President
Nuclear Generation

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

Don Neighbors, Senior Project Manager
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ATTACHMENT A
IPN-86- 54

Unwarranted Expenditures for Compliance with Appendix R

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Unwarranted Expenditures for Compliance with Appendix R

Application of Appendix R where relief has been requested in the referenced submittals would result in the unwarranted expenditures of engineering and financial resources for:

1. Engineering and installation of fire barriers to:
 - Isolate the common stairway enclosure between the Upper and Lower Electrical Cable Tunnels,
 - Wrap exposed cable insulation considered intervening combustibles between Auxiliary Feedwater Pumps (AFW),
 - Separate redundant Residual Heat Removal Pumps (RHR) and Charging Pumps in lieu of the existing configuration consisting of full or partial height and width concrete barriers in the Primary Auxiliary Building, and
 - Separate redundant Component Cooling (CCW) Pumps with a fully rated barrier in lieu of the installed radiant energy shield.
2. Engineering and installation of additional piping, sprinkler heads, and supporting structures to provide:
 - Full area automatic suppression on the 15 ft ,41 ft and 55 ft elevations of the Primary Auxiliary Building,
 - Fixed automatic suppression where alternate shutdown capability has been provided for motor control centers for Charging Pumps,CCW and Diesel Ventilation systems,
 - Detection and automatic suppression for Atmospheric Steam Dump Valves in the Turbine Building,and
 - Detection and automatic suppression for Service Water Pumps and Backup Service Water Pumps in the Yard Area.
3. Installation and maintenance of eight hour battery powered lighting for the access route through the yard to the Appendix R diesel which is currently provided by yard security lighting.

4. Significant rerouting of power, control and instrumentation cabling along with associated conduits, ducts and supports for:
 - Atmospheric Relief Valves, Charging Pumps, CCW, AFW and RHR Pumps in Electrical Cable Tunnels, and
 - RHR, Charging and CCW Pumps in the Primary Auxiliary Building.
5. Increased surveillance on new or extended fire suppression and fire detection systems.
6. Evaluation of and possible need to provide additional fire main capacity if the fire main system is modified.
7. Consideration of the increased congestion that will result from additional modifications in numerous plant locations which will complicate future plant modifications/operations.