POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE

(212) 397-6200

TRUSTEES

FREDERICK R. CLARK

GEORGE L. INGALLS VICE CHAIRMAN

RICHARD M. FLYNN

ROBERT I. MILLONZI

WILLIAM F. LUDDY

NEW YORK, N. Y. 10019

April 20, 1979 IPN-79-17

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

Attention: Mr. Albert Schwencer, Chief Operating Reactors Branch No. 1 Division of Operating Reactors

Subject: Indian Point 3 Nuclear Power Plant Docket No. 50-286 Fire Protection Program Review Administrative Controls

Dear Sir:

On March 21, 1979, the Authority's staff had a phone conversation with Mr. L. Gage of Region I concerning our submittal to you of February 13, 1979 (IPN-79-4) on the subject item. As a result of that discussion, enclosed please find ten (10) copies of Attachment 1 which contain revised responses to Questions 2a, b, g, j, k, 1 and m of the above mentioned submittal.

Very truly yours,

Paul/ J. Early

Assistant Chief Engineer-Projects

GEORGE T. BERRY EXECUTIVE DIRECTOR

LEWIS R. BENNETT GENERAL COUNSEL AND ASSISTANT EXECUTIVE DIRECTOR

JOSEPH R. SCHMIEDER CHIEF ENGINEER

JOHN W. BOSTON DIRECTOR OF POWER OPERATIONS

THOMAS F. MCCRANN, JR.

ATTACHMENT 1

REVISED RESPONSES TO NRC REQUEST OF DECEMBER 12, 1978 FOR ADDITIONAL INFORMATION (ENCLOSURE 1) ON FIRE PROTECTION PROGRAM ADMINISTRATIVE CONTROLS

POWER AUTHORITY OF THE STATE OF NEW YORK INDIAN POINT 3 NUCLEAR POWER PLANT DOCKET NO. 50-286 April 20, 1979

The comparison of the Indian Point 3 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point 3 fire protection program:

Response

Responses to Question No. 2 address safety related areas as defined in B.T.P. 9.5.1.

a. Responsibilities of the fire brigade members in a fire emergency should be assigned to each brigade member or brigade position. These responsibilities should not conflict with the brigade member's responsibilities under normal plant conditions.

Response

Positions defined for the fire brigade are fire brigade leader and fire brigade member, only. All members of the fire brigade are trained and retrained in various phases of fire extinguishment by both academic and actual "hands on" training. The Authority believes that it is more effective to have members of the fire brigade (other than the leader) with interchangeable roles in coping with fire extinguishment rather than rigidly defining each fire brigade position. Each fire brigade member shall be assigned responsibilities by the fire brigade leader to be conducted during a fire emergency at the time. Brigade members normal plant responsibilities will be known to the fire brigade leader. These responsibilities shall not conflict with responsibilities under normal plant conditions. Fire brigade leader and member responsibilities will be defined in the training procedures.

b. The fire brigade member's qualification requirements should include satisfactory completion of a physical examination for performing strenuous activity, and satisfactory completion of the fire brigade training.

Response

Fire brigade member's qualification requirements shall include satisfactory completion of training and a physical examination. This physical would identify any condition that would prevent members from participating in a strenuous activity as fire fighting. An indication of any such condition would eliminate that personnel from fire brigade activities. Fire training records will document satisfactory completion of training by fire brigade members.

Question No. 2, cont'd

- g. The comparison indicates that a permit system is used for all welding and burning operations, but does not identify who must authorize the permit. All welding and burning work permits should be authorized by the responsible Foreman or Supervisor. The Foreman or Supervisor should have received training in potential fire hazards and precautions that should be taken. Before issuing the permit, the responsible Foreman or Supervisor should physically survey the area where the work is to be performed and established that the following precautions have been accomplished:
 - All moveable combustible material below and within a 35 foot radius of the cutting, welding, grinding or open flame work has been removed. (See NFPA 51B)
 - 2. All immovable combustible material below and within a 35 foot radius has been throughly protected by asbestos curtains, metal guards, or flameproof covers, and fire extinguishers, hose, or other firefighting equipment are provided at the work site. (See NFPA 51B)

Response

The Authority will comply with NFPA 51B for all welding and burning operations.

- j. Fire fighting strategies should be developed for fighting fires in all safety related areas and areas which may present a hazard to safety related areas. These strategies should be provided in a format that affords quick reference in a fire situation and that can also be used in the training program. These strategies should include information to assist fire fighting activities, including:
 - 1. Identification of combustibles in each plant zone covered by the specific fighting strategy.
 - 2. Fire extinguishants best suited for controlling the fires associated with the combustible loadings in that zone and the nearest location of these extinguishants.
 - 3. Most favorable direction from which to attack a fire in each area, in view of the ventilation direction and access hallways, stairs and doors. All access and egress routes that involve locked doors should be specifically identified in the strategy with the appropriate precautions and methods for access specified.
 - Identification of the plant equipment that should be managed (i.e., de-energized or cooled) to reduce the hazard potential during a local fire.
 - 5. Assignment of responsibilities to brigade positions including command control of the brigade, fire hose laying, applying the extinguishant to the fire, advancing support supplies to the fire scene, communication with the control room, coordination with the outside fire departments.
 - 6. Identification of radiological and toxic hazards in fire zone.
 - 7. Control of ventilation system operation for fire containment or smoke clearing operations.
 - 8. Operations (e.g., application of particular extinguishant or de-energizing equipment) requiring control room and shift engineer coordination or authorization.

Response

The Authority has no intention of developing detailed preplanned strategies for fighting fires in all safety related areas. Assurance of the adequacy of fire protection is primarily provided for by fire barriers and fixed automatic detection and suppression systems The fire brigade leader shall be familiar with plant operations and safety related areas and his knowledge shall be the basis for strategies taken during a fire. Training and drills will prepare members of the fire brigade to adequately fulfill the considerations described in items 2j, 1 through 8. These training sessions and drills will be filed to use as permanent records for future reference and training.

k. The validity of the preplanning strategies should be tested by appropriate full-dress drills to check the logic of the strategy, the adequacy of the equipment, personnel understanding and to uncover unforseen problems.

Response

Fire drills will be conducted in different areas throughout the plant. These drills will be critiqued upon their completion to correct problems experienced. These drills and instructions will test the validity of the program.

- The comparison of BTP 9.5-1 does not describe the inspections performed on fire protection systems. Inspections should be performed to include the following:
 - Inspections of installation, maintenance and modification of fire protection systems; to assure conformance to design and installation requirements.
 - Inspection of penetration seals and fire retardant coating installations to verify the activity is satisfactorily completed.
 - 3. Inspections of cable routing to verify conformance with design requirements, following routing of new cabling.
 - 4. Measures to assure that inspection personnel are independent from the individual performing the activity being inspected and are knowledgeable in the design and installation requirements for fire protection.
 - 5. Inspection procedures, instruction and check lists which provide for:
 - . Identification of characteristics and activities to be inspected.
 - . Identification of the individuals or groups responsible for performing the inspection operation.
 - . Acceptance and rejection criteria.
 - . Recording evidence of completing and inspecting and installation, maintenance or modification activity.
 - . Recording results of the inspection operation.

Response

The Authority shall perform inspections of fire protection systems for safety related areas as defined in B.T.P. 9.5.1. These inspections should be performed to include the items listed in 2 1, 1 through 5, as applicable. Fire protection systems adejacent to safety related areas and identified in the Technical Specifications shall also be inspected.

m. Following modification, repair or replacement, sufficient testing using appropriate NFPA and other standards is performed to demonstrate that fire protection systems are operational and will perform satisfactorily in service. Written test procedures for installation test incorporate the requirements and acceptance limits contained in applicable design documents.

Response

Following modification, repair or replacement to a fire protection system in a safety related area, or adjacent to safety related areas as identified in the Technical Specifications, the Authority shall perform and document sufficient testing using appropriate NFPA and other standards to demonstrate that fire protection systems are operational and will perform satisfactorily in service.



2.

cc: DSB Files

14

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

MEMORANDUM FOR: TERA Corp.			
FROM: US NRC/TIDC/Di	stribution	Services Bra	anch
SUBJECT: Special Docume	nt Handling	; Requiremen	ts
1. Please use the followin attached document.	g special d	listribution	list for the

The attached document requires the following special considerations:



Only one oversize enclosure was received - please return for Regulatory File storage.

Proprietary information - send affidavit only to the NRC PDR

Other: (specify)

TIDC/DSB Authorized Signature