

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019

(212) 397-6200

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March 7, 1980  
IPN-80-28

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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  
Confirmatory Order - Thirty Day Actions

Dear Sir:

This letter is in response to the NRC Confirmatory Order dated February 11, 1980.

Attachment 1 documents the actions taken by the Authority on the thirty day items as required by the Confirmatory Order.

Very truly yours,

  
J.R. Schmieder  
Chief Engineer

cc: Mr. R. Rebelowski  
Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 38  
Buchanan, New York 10511

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ATTACHMENT 1

1. A vendor representative will be stationed on site for engineering consultation at Indian Point Unit 2 and 3 on plant operations and maintenance to increase plant safety. The representative shall be from the NSSS vendor, architect/engineer or start-up engineering firm.

Response: A Westinghouse representative has been at the Indian Point site since February 11, 1980 to provide engineering consultation on plant operations and maintenance.

2. To ensure control room habitability under accident conditions, the licensee shall reexamine ventilation intakes, location of potential plant leakage (ingress and egress), and control room filter capabilities, and submit the results of this review to the NRC.

Response: The control room habitability, potential direct leakage sources (ingress/egress), and filter capability were examined. The as built drawings were reviewed and the habitability of the control room was verified by visual inspection of all the critical areas. The as built system was found to be consistent with the system described in the FSAR.

All doors into the control room are airtight and lead to enclosed areas like the turbine building, control building stairwell, and not to the outside. The control room is constructed of concrete with all openings around cables sealed airtight with a fireproof compound; hence the infiltration and exfiltration through walls, floor and ceiling is negligible. Even with the very conservative assumptions

of the doors opening to the outside and a 15 mile per hour wind speed, the make-up air requirement is only 545 cfm. This make-up requirement is approximately one-half of the system capacity of 1000 cfm as reported in Section 9.0 of the FSAR. The fresh air intake for the control room air conditioning system is located in the east wall of the control building below the electrical tunnel between elevations 30'-0" and 18'-0". This is sheltered by an enclosure formed by the electrical tunnel floor above and the concrete walls on the south and east sides.

Since the control building is physically separate from the containment and auxiliary building, there are no sources of contaminated leakage which could result in airborne concentrations in the control building, turbine building or at the control room fresh air intake in excess of those associated with containment and auxiliary building releases. Also, should it become necessary the control room is provided with self-contained breathing apparatus.

The filter system consists of a roughing filter, HEPA, 3" charcoal filter and HEPA. This system as tested is capable of greater than 95% removal efficiency for elemental, organic and particulate forms of radioiodine.

3. Emergency action levels shall be reviewed to require notification of the NRC for all events in the emergency classes described in NUREG-0610, September 1979.

Response: The procedures to incorporate notification requirement have already been rewritten. The training of all cognizant personnel will be completed by March 11, 1980.

4. The licensee shall comply with the NRC's "INTERIM POSITION FOR CONTAINMENT PURGE AND VENT VALVE OPERATION PENDING RESOLUTION OF ISOLATION VALVE OPERABILITY", as contained in the October 1979 letter to the licensee.

Response: The Authority's position on compliance with the NRC's interim positions has been set forth in two letters 1) IPN-79-7 dated March 2, 1979 and 2) IPN-79-102 dated December 28, 1979 and is summarized below.

- A. Administrative procedures have been revised to specify that whenever the reactor is above cold shutdown, emphasis will be placed on operating the containment in a passive mode as much as possible and on limiting all purging and venting times to as low as achievable. The Authority will limit containment pressure relieving to the minimum time necessary to maintain containment atmospheric pressure. The angle of opening of the Containment Pressure Relief Valves #PCV-1190, 1191 and 1192 has been limited to a maximum of 40°.
- B. The purge valves will be administratively maintained closed when above cold shutdown until the complete analysis is performed or valve angular opening restricted between 30° and 50° in accordance with NRC interim position 2.

C. The engineered safeguards circuitry has been modified to prevent blockage of a containment isolation signal to close the purge valves in case of a reset of the high radiation signal.

5. Plant personnel shall be trained or retrained in the following areas within thirty days, or prior to startup if required by the Lessons Learned implementation schedule. Plant personnel shall also be retrained in the following areas within thirty days of the time that there are significant changes to the procedures or requirements applicable to these areas:

Containment and Degraded Core Sampling  
Degraded Core - Training  
Emergency Power for Pressurizer Heaters and Decay Heat Removal  
Containment Isolation  
Containment Purge/Purge Valve Operation  
Subcooling Meter Operation  
Technical Support Center  
Onsite Operational Support Center  
Near-Site Emergency Operations Center  
Emergency Preparedness Plan  
In-Plant Area Airborne Radioiodine Monitors  
Surveillance Testing of Non-ESF Filtration System

Response: Training or retraining of personnel has been completed in all areas excepting Emergency Preparedness plan. The latter will be completed by March 11, 1980.

6. The licensee shall perform diesel generator testing in accordance with Regulatory Guide 1.108 with a corresponding change in the allowable outage time stipulated in the Limiting Conditions of Operation as follows:

<u>Numbers of DG Failures In Prior 100 Tests</u>	<u>Test Interval (Days) (R.G. 1.108)</u>	<u>Allowable Outage Time</u>
0 or 1	30	As Is
2	13	As Is
2	7	As Is
4	3	32 hr.
5	3	8 hr.
6 or more	3	None*

\*Plant must achieve hot shutdown within 12 hours and cold shutdown within the following 30 hours.

Response: The diesel generator testing in accordance with Regulatory Guide 1.108 and the Confirmatory Order will be completed by March 11, 1980.