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March 25, 1980  
IPN-80-34

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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  
Fire Protection Program

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating License", and attachments thereto.

This application seeks to amend certain completion dates for Fire Protection items contained in Table 3.1 of the Safety Evaluation Report issued with Amendment No. 24 to Facility Operating License No. DPR-64 and incorporated by reference into License Condition 2.I.

The NRC issued Amendment No. 24 to FOL No. DPR-64 for the Indian Point Nuclear Generator Plant, Unit No. 3, dated March 6, 1979, which dealt with fire protection system modifications. The accompanying Safety Evaluation Report detailed the required modifications and the implementation dates for these modifications.

In 1976 the Power Authority began an extensive construction program at Indian Point 3 to improve operational and maintenance capabilities through the provision of additional facilities. This work included additional fire protection systems on both the original plant and the new facilities.

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In 1978 and 1979 the NRC established new requirements for fire protection which required modifications to both the additional facilities and the fire protection systems. These modifications affect all areas of the plant and the site. These modifications have caused major perturbations in plant operations and in the completion of the additional facilities construction program. Backfitting is required in areas that are already congested and where more than one subcontractor is required to work simultaneously. Some are in close proximity to safety related systems and equipment and, therefore, require very detailed work procedures. Careful analysis of any possible effect on safety related functions required seismic analyses and a quality assurance program, by the subcontractors. In addition, safety evaluations of all additions and modifications are prepared and reviewed. A large number of tie-ins are required which could affect plant operations and limit when, and for how long, this tie-in work could be accomplished. The work has been difficult to initiate in many cases since the technical aspects had to be approved by the NRC, the Authority's fire insurance carrier (American Nuclear Insurers) and the Authority's staff. Also, the continuously increasing security requirements have and continue to reduce the productivity of the construction workers. The complexity of the work and the required approval procedure have caused the progress of the work to be much slower than originally contemplated.

The work has been monitored weekly and "work around" techniques have been utilized wherever possible. The Authority has concluded that all of the implementation dates cannot be met in spite of our best efforts. A number of the modifications will be completed on schedule. In those areas where the modifications are not completed, interim procedures will be implemented to improve the plant's fire protection capabilities. Continued safe operation of the Indian Point 3 facility will not be compromised while the fire protection improvements are completed and there will be no undue risk to the health and safety of the public.

The Authority has classified this application as Class III, as it involves the single issue of the fire protection modification completion dates. Enclosed is a check in the amount of \$4,000 as the filing fee per 10 CFR §170.22, which the Authority pays under protest pending a final determination of the legality of the fee schedule.

In support of this application, we are enclosing forty (40) copies of the Safety Evaluation corresponding to the revised table of completion dates.

Very truly yours,



Paul J. Early  
Assistant Chief Engineer-Projects

cc: George V. Begany (Mayor)  
Village of Buchanan  
Buchanan, New York 10511

White Plains Public Library  
100 Martine Avenue  
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Mr. T. Rebelowski, Resident Inspector  
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