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September 26, 1980
IPN-80-87

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Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 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
Fire Protection Program Review

Dear Sir:

In response to Question 7 of your April 26, 1978 request for additional information on the subject item, the Authority provided a list of ventilation ducts/louvers that were to be provided with fire dampers (Authority letter IPO-125, dated June 29, 1978). On January 22, 1980 the Authority submitted a revised response to Question 7. Refer to Attachments 1 and 2 to Authority's January 22, 1980 letter (IPN-80-7).

Subsequent to the above submittals the Authority conducted a further review of the fire damper requirements. As a result of this review, it has been concluded that several of the fire dampers, included in both the original and revised lists, do not serve a fire protection function and consequently, have been deleted.

Attachment "A" is a listing of the fire dampers originally included in the response to Question 7 that are to be installed at the Indian Point 3 Nuclear Power Plant. Attachment "B" is a listing of the fire dampers, also included in the response to Question 7, that have been deleted. The rationale for the deletion is provided in each case.

The dampers listed in Attachment "A" are presently under review to determine any potential impact on the safe operation of the plant. Upon the completion of this review the Commission will be advised accordingly.

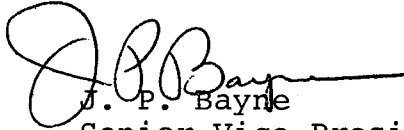
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The drawings referenced on Attachment "A", although they are not final, have been enclosed for your information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. P. Bayne", with a long horizontal flourish extending to the right.

J. P. Bayne
Senior Vice President
Nuclear Generation

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

ATTACHMENT A

Following is a tabulation of the fire dampers that are to be installed at the Indian Point Nuclear Power Plant:

FAN HOUSE BUILDING (Dwg. Nos. M-155 and M-159)

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
26	El. 72' - Zone 88A:	28"x26" duct through floor into Zone 59A
28	El. 72' - Zone 88A:	12" dia. through floor into Zone 59

PRIMARY AUXILIARY BUILDING (Dwg. Nos. M-157, M-158 and M-159)

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
29	El. 15' - Zone 10A:	18"x6" duct through north wall into Zone 8A.
32	El. 34' - Zone 9:	55"x22" duct through north wall into Zone 5A.
33	El. 34' - Zone 68A:	6"x8" duct through north wall into Zone 9.
33a	El. 34' - Zone 68A:	14"x8" duct through north wall into Zone 9.
34	El. 34' - Zone 68A:	6"x8" duct through east wall into Zone 6A.
37	El. 41' - Zone 2A:	28"x8" duct through north wall into Zone 58A.
38	El. 55' - Zone 5:	22"x12" duct through west wall into Zone 21A.
39	El. 55' - Zone 7:	18"x14" duct through west wall into Zone 6.
40	El. 55' - Zone 17A:	24"x24" duct through ceiling into Zone 27A.
41	El. 55' - Zone 17A:	10"x8" duct through east wall into Zone 20A.
48	El. 55' - Zone 18A:	24"x38" duct through east wall into Zone 17A.
49	El. 73' - Zone 27A:	12"x16" duct through south wall into Zone 24A.

CONTROL BUILDING (Dwg. Nos. M-155 and M-159)

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
1	El. 15' - Zone 14:	5'x3'-9" louvers in east wall into duct in hallway of Zone 34A.

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
4	El. 33' - Zone 11:	4'x5' opening through Zone 35A and louver to outside air inlet.
6	El. 15' - Zone 35A:	18"x20" duct through duct those from Zone 34A.
2	El. 15' - Zone 14:	5'x3'-9" opening through south wall into Zone 34A.
12	El. 33' - Zone 12:	6"x11" duct through roof through Zone 11 to outside.
13	El. 33' - Zone 13:	6"x11" duct through roof through Zone 11 to outside.
9	El. 15' - Zone 14:	Transfer grille between Control Building and TG Building Zone 37A.
10	El. 33' - Zone 11:	Transfer grille between Control Buidling and TG Building Zone 43A.
11	El. 33' - Zone 11:	Transfer grille between Control Building and TG Building Zone 43A.
50	El. 33' - Zone 34A:	Transfer grille between Cable Spreading Room and Fan Room.

Fire dampers 9, 10, 11 and 50 were not included in the original or revised response to Question 7. Dampers nos. 9, 10, and 11 were listed in the revised response to Question 11, Section 11.g submitted by the Authority in Reference (3) of the January 22, 1980 letter (IPN-80-7). Fire damper 50 was just recently included.

Smoke dampers 51, 52, 53, 54, 55 and 56, indicated on Drawing M-159, are not used to separate fire zones. Their function is to isolate the areas prior to the discharge the CO₂ Fire Protection System.

ATTACHMENT B

Following is a tabulation of the fire dampers that are to be deleted from the list that was submitted to the NRC in the Response to Question No. 7. The rationale for each deletion is also provided.

FAN HOUSE

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
23	El. 72' - Zone 88A:	58"x72" duct through worth wall. This damper is associated with a penetatration of an exterior wall. A such it does not serve a fire protection function and therefore, it should be deleted.
25	El. 72' - Zone 88A:	42"x72" louver through ceiling near col. 3.3. The ceiling of Zone 88A is not a fire barrier, consequently, fire damper no. 25 is not required and should be deleted.
27	El. 72' - Zone 88A:	12" dia. duct through ceiling. This fire damper should be deleted for the same reason as fire damper no. 25 above.
24	El. 72' - Zone 88A:	58"x70" duct through south wall to outside alley and into the PAB. This duct runs outside through a distance of approximately 20 feet to a low fire loading area (Zone 17A) which is a corridor at elevation 55 of the PAB. Based on the fire loading characteristics of the zones involved the probability of a fire that could be propagated through the approximately 20 feet of outside duct connecting these two zones is extremely remote. A fire damper in this case, therefore, is not warranted.

PRIMARY AUXILIARY BUILDING (PAB)

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
30	El. 15' - Zone 12A:	30"x30" duct through a three foot wide floor to ceiling entry slot to Zone 8A. Zone 12A in the area of the entry slot is an empty section of a corridor with low fire loading (513 BTU/Sq. Ft.). Zone 8A is a empty room with also low fire loading (632 BTU/Sq. Ft.). Based on the physical boundary and fire loading of the two zones a fire damper will not serve a fire

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
		protection function and it should be deleted. Furthermore the closing of the three foot opening with fire rated material, which would make a fire damper effective, is not warranted.
31	El. 34' - Zone 9:	6"x8" duct through south wall into Zone 6A. A field survey revealed that a penetration in this area does not exist, as a result this damper has been deleted.
35	El. 41' - Zone 1:	56"x60" duct through ceiling into Zone 17A. This duct passes through a 23'-3" x 32'-0" open grating which exists between Zones 1 and 17A. Based on the physical boundary and the fire loading of the zones involved, a damper would not serve a fire protection function. Therefore, fire damper no. 35 should be deleted.
36	El. 41' - Zone 1:	70"x52" duct into Zone 1A. As indicated in the Fire Hazards Analysis, there is no wall between Zone 1 and 1A. Therefore, fire damper no. 36 should be deleted.
42	El. 55' - Zone 17A:	14"x34" duct through north wall into Zone 7. This damper was deleted for the same reasons as damper no. 30, i.e., duct passes through a three foot wide floor to ceiling slot entry way. As in the case of damper no. 30, the fire loading of the zones involved is low.
43	El. 55' - Zone 17A:	40"x36" duct through roof to outside. This damper is deleted for the same reason as damper no. 24.
44	El. 55' - Zone 17A:	38"x36" duct through east wall into Zone 19A. A field survey revealed that the above duct does not penetrate a fire barrier. Consequently, damper no. 44 should be deleted.

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
45	El. 55' - Zone 17A:	18"x18" duct through east wall into Zone 20A. A field survey revealed that a duct of this size does not exist in this area. Consequently, damper no. 44 should be deleted.
46	El. 55' - Zone 18A:	24"x4" duct through north wall into Zone 17A. This damper was deleted for the same reasons as dampers no. 30 and 42, i.e., duct passes through a three foot wide floor to ceiling slot entry way. As in the preceding cases the fire loading of the zones involved is low.
47/48	El. 55' - Zone 19A:	(1) 28"x38" and (1) 12"x12" duct through east wall into Zone 18A. A field survey revealed that there is no fire barriers in this location. Therefore, damper no. 47 should be deleted. The 12"x12" damper 48 should be deleted for the same reason as damper no. 46 above.

DIESEL GENERATOR BUILDING

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
-	El. 11' - Zone 102A:	14" dia. duct through east wall into Zone 36A. Damper was deleted because the duct does not exist.
14-22	Diesel Gen. Bldg.:	Outside louvers. These dampers are associated with louvers to outside. As such, they do not serve a fire protection function and should be deleted.

ELECTRICAL TUNNELS

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
5	El. 15' - Zone 7A:	45"x60" louver to outside. Since this damper is associated with a louver to outside it does not serve a fire protection function and it should be deleted.

CONTROL BUILDING

<u>DAMPER NO.</u>	<u>LOCATION</u>	<u>DESCRIPTION</u>
7	El. 33' - Zone 11:	3'x12' louver in south wall to outside. This damper should be deleted for the same reason as damper no. 5.
8	El. 15' - Zone 14:	3'x12' louver in south wall to outside. This damper should be deleted for the same reason as damper nos. 5 and 7.