



J. Phillip Bayne
Executive Vice President
Nuclear Generation

September 26, 1983
IPN-83-80

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
Appendix R Fire Protection Review

Dear Sir:

This letter serves to respond to Mr. S. A. Varga's letter dated July 22, 1983 and the draft Safety Evaluation Report (SER) enclosed thereto regarding Indian Point 3 compliance with 10 CFR 50, Appendix R, Section III.G.

In light of specific areas of concern identified in the draft SER involving vertically adjoining fire zones, consideration of cable insulation and jacketing as an intervening combustible, and the assessment of Appendix R compliance based on valid fire areas, the Authority has established a Task Force to review and re-evaluate Indian Point 3 compliance with Appendix R. The scope of the Authority's effort will include review and upgrade of the existing fire hazards analysis and a detailed review of the plant to ensure compliance with the requirements of the regulations. The Task Force effort will encompass Sections III.O, III.J, and III.L of Appendix R as well as Section III.G.

The Authority is currently evaluating the necessity of contracting with a consultant to assist in completion of the Appendix R Task Force effort. Preliminary estimates indicate that the Task Force effort will require a minimum of six (6) to nine (9) months to complete after selection of a consultant. Upon completion of the effort, the results of the Task Force efforts will be reported to the Commission and any additional exemption requests, if necessary, will be submitted, along with the necessary supporting information, at that time.

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Detailed responses to the sixteen (16) exemption denials contained in the draft SER will be developed as part of the Task Force effort and in consideration of valid fire areas, cable insulation as an intervening combustibile material, and vertically adjoining fire areas. Prior to completion of the Task Force review, formal response to the exemption denials is not feasible.

The Authority would like to point out that the draft SER does not address the exemption request contained in Attachment A to our letter IPN-83-3 dated January 12, 1983, concerning the requirement to provide fixed suppression in the central control room. Timely disposition of the requested exemption would be appreciated as it will be of assistance to the Task Force.

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

Very truly yours,


J. P. Bayne
Executive Vice President
Nuclear Generation

cc: Resident Inspector's Office
Indian Point Unit 3
U. S. Regulatory Commission
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