



**J. Phillip Bayne**  
Executive Vice President  
Nuclear Generation

March 14, 1984  
IPN-84-10

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  
Radiation Protection Factor for the  
Emergency Operations Facilities

Dear Sir:

During a February 8, 1984 telephone conversation, the Commission requested information concerning the Indian Point Emergency Operations Facility (EOF). Specifically, the Authority was requested to provide a preliminary cost estimate for upgrade of the present EOF to an overall radiation protection factor of five. This request was made in full recognition of the fact that the existing EOF, in conjunction with our alternate capability, complies with the guidelines set forth in Supplement 1 to NUREG-0737.

The present primary EOF is located near-site in a building owned by the Consolidated Edison Company of New York. In 1980, the Indian Point primary EOF was upgraded to meet the NRC guidelines. The upgraded primary EOF was utilized for the Authority's March, 1982 full scale emergency preparedness exercise and for Con Edison's March, 1983 exercise.

The primary EOF is located in the immediate proximity of the plant, and the alternate EOF is located approximately sixteen miles from the plant. As noted in Table 1 to NUREG-0737 Supplement 1, if the utility had begun construction of a new building for an EOF that is located within five miles, that new facility is acceptable (with less than a protection factor of five and ventilation isolation and HEPA) provided that a backup EOF is provided. As stated in our response to Supplement 1 we informed you that although the present AEOF we share with Con Edison meets the requirements, we were in the process of converting our Headquarters Emergency Response Center Facility into an AEOF for Indian Point Unit No. 3. This facility is located in White Plains, New York.

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Consolidated Edison had provided the Authority with a cost estimate of \$850,000.00 for upgrade of the EOF roof to provide a P.F. of five. This preliminary estimate is based solely upon modification of the EOF roof and does not consider other related costs. The Authority further believes that our plant specific approach and justifications are acceptable and that additional expense is unwarranted.

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  
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U. S. Nuclear Regulatory Commission  
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