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IPN-85-12

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
BTP 9.5-1 Fire Protection Safety Evaluation
Cable Tunnel Sprinkler System

Dear Sir:

A matter requiring clarification has come to the attention of the Power Authority regarding the sprinkler system installed in the Cable Tunnels at the 33 and 43 foot elevation of the Primary Auxiliary and Control Buildings at Indian Point 3 (IP-3).

The NRC Staff Safety Evaluation Report (SER) written for the BTP 9.5-1 review of IP-3 documents the acceptance of the water suppression systems at the plant. It could be construed from the SER that this acceptance was predicated on the premise that the water suppression systems conformed to all applicable provisions of NFPA 13 since no deviations from the BTP were identified. The Cable Tunnel sprinkler system, however, does not include a supervisory air system. While the Authority does not consider the lack of supervision for the Cable Tunnel sprinkler system a technical concern, we consider it prudent to clarify the docket on this matter particularly in light of the staff position documented in response to Question 8.9 of Enclosure 6 to Generic Letter 85-01.

The original sprinkler system in the Cable Tunnels is discussed in the Safety Evaluation Report supporting the operating license for IP-3. As documented in Section 9.5-1, the system was designed to the applicable portions of the Nuclear Energy Property Insurance Association (NEPIA) and the National Underwriters Codes for Standards. The NEPIA design guidance, "Basic Fire Protection For Nuclear Power Plants", March, 1970, did not specify supervision requirements for the Cable Tunnel sprinkler system.

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Furthermore, the version of NFPA-13 in effect at the time of plant design allowed for installation of sprinkler systems without supervision if approved by the jurisdictional authority although this entity is not defined.

The Authority has initiated modifications to add a supervisory air system to the Cable Tunnel sprinkler systems. The modifications will satisfy the provision of NFPA-13 specifying supervision for these sprinkler systems. The Authority considers the current configuration of this sprinkler system acceptable in the interim as discussed below.

The operability of the Cable Tunnel suppression system at IP-3 does not depend on the presence of a supervisory air system. Supervision of sprinkler systems is generally provided as a maintenance feature to indicate a loss of system integrity due to damage such as a broken sprinkler head. The seismic design of the Cable Tunnel sprinkler system at IP-3 is such that loss of system integrity is precluded. In addition, current Technical Specification surveillance requirements specify a periodic visual inspection of the sprinkler system and spray heads to verify that no nozzle damage exists and that the nozzles are unobstructed. As such, the application of the provision of NFPA-13 specifying supervision for this installation is not considered necessary. Based on the design of the Cable Tunnel sprinkler system and the current surveillance requirements for the system, it is the Authority's position that lack of installed supervision is not a technical concern.

We trust you find this information satisfactory. If you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,



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cc: Resident Inspector's Office
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