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IPN-85-46

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
NUREG-0737, Item III.D.3.4 "Control Room Habitability"

Reference: Letter from S.A. Varga to L.W. Sinclair, dated March
18, 1983 entitled: "Order Confirming License
Commitments On Post-TMI Related Issues"

Dear Sir:

On March 18, 1983, the NRC issued the Authority a confirmatory order (see reference) which confirmed the Authority's commitments to implement the requirements of various NUREG-0737 items. Item III.D.3.4 "Control Room Habitability" is part of this order and is required to be completed prior to startup from the current cycle 4/5 refueling outage. This letter serves to request an extension of the date by which item III.D.3.4 is to be completed.

Since issuance of the Confirmatory Order the Authority has contracted with Stone and Webster Engineering Company (S&W) to perform an analysis, in accordance with Section 2.2.3 of NUREG-0800 (Standard Review Plan), to address a toxic gas accident occurring at or around the IP-3 site. This analysis shows, using NRC accepted techniques, that the aggregate probability of a release of anhydrous ammonia and chlorine due to a rail accident, which could incapacitate control room personnel, is less than 10^{-6} per year. Therefore, in accordance with Section 2.2.3 of NUREG-0800, and in the judgement of the Authority, monitoring equipment for these toxic gases is not necessary.

The S&W report also includes a tank integrity analysis of the onsite carbon dioxide (CO₂) tanks (two 10 ton tanks). This analysis concludes that the amount of CO₂ which will be released is far below the toxicity limits identified in Regulatory Guide 1.78 Rev. O. Therefore, there is no need for any CO₂ monitoring equipment.

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The NRC's safety evaluation with regard to III.D.3.4 dated January 27, 1982 also stated the need for an additional radiation monitor in the outside makeup air intake along with another damper. The Authority performed an analysis on the existing IP-3 control room area radiation monitor (R-1) with respect to a worse case DBA LOCA at IP-2 (this being the accident the NRC was concerned about). This analysis shows that the R-1 alarm setpoint will automatically switch the control room ventilation system over to the Incident Mode before the dose guidelines of General Design Criteria 19 are exceeded. Therefore, based on the above analysis, another radiation monitor is not required.

It should also be noted that Consolidated Edison's Emergency Plan Procedures for IP-2 state that the IP-3 Control Room will be notified by the IP-2 Control Room of a Notification of an Unusual Event, Alert, Site Area Emergency or General Emergency. The IP-3 Control Room operators have the ability to place the Control Room ventilation system in the Incident Mode, upon IP-2's notification.

With regard to the addition of another damper in the outside makeup air intake, the Authority believes based on the S&W analysis for chlorine, anhydrous ammonia and carbon dioxide along with the Authority's analysis of radiation monitor R-1, there is no need for the redundant damper.

Prior to the results of any analysis, the Authority installed a toxic gas monitoring system during the cycle 3/4 refueling outage which provided monitoring capability for chlorine, anhydrous ammonia and carbon dioxide. The Authority is in the process of upgrading the existing toxic gas monitoring system at IP-3.

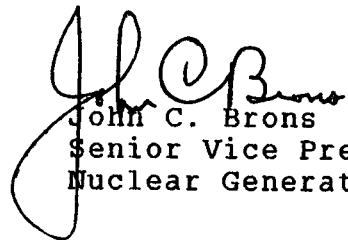
Based on the aforementioned analysis the Authority believes a toxic gas monitoring system is not required. Nevertheless, as stated above, the Authority is in the process of upgrading IP-3's existing monitoring system. However, the Authority maintains that there is no need to provide a redundant monitoring system as NUREG-0737 III.D.3.4 requires.

The Authority, therefore, is enclosing for your review the S&W report dated June 6, 1985 (revised August 1, 1985) regarding Item III.D.3.4 as Attachment I.

The Authority requests that an extension be granted for the completion of Item III.D.3.4 of NUREG-0737 until after your review of the above attachments is completed. If based on your review additional modifications are required, we will complete all modifications that can be done while the plant is operating within 90 days of your notification. Any modifications which cannot be performed while the plant is operating will be performed at the next outage of sufficient duration.

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

Very truly yours,


John C. Brons
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cc: Resident Inspector's Office
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