

John C. Brons Senior Vice President Nuclear Generation

September 19, 1985 IPN-85-47

Director of Nuclear Reactor Regulation United States 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

Information to Support the Evaluation of IP-3 to 10 CFR

50.48 and Appendix R to 10 CFR 50

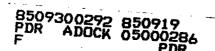
References:

(1) J.P. Bayne letter to S.A. Varga, dated August 16, 1984.

- (2) S.A. Varga letter to J.P. Bayne, dated July 22, 1983.
- (3) C.A. McNeill, Jr. letter to S.A. Varga, dated March 15, 1985.
- (4) J.C. Brons letter to S.A. Varga, dated June 14, 1985.
- (5) J.P. Bayne letter to S.A. Varga, dated August 13,
- (6) S.A. Varga letter to J.P. Bayne, dated April 16, 1984.
- (7) D.G. Eisenhut letter to J.P. Bayne, dated February 2, 1984.

#### Dear Sir:

In Reference (1), the New York Power Authority submitted a comprehensive reevaluation of the Indian Point 3 Nuclear Power Plant compliance to Sections III.G and III.L of Appendix R to 10 CFR 50. The reevaluation was undertaken, in part, to resolve the concerns cited by the NRC Staff in the draft Safety Evaluation Report of Reference (2).



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The attached information is provided to clarify the Reference (1) reevaluation report and to assist the Staff in the review of the proposed exemption requests. The information provided in Attachment 1 consists of revised pages to the Reference (1) report to facilitate the Staff's review. In addition, the Authority is providing a discussion of Sections III.J and III.O of Appendix R as well as other matters related to fire protection and safe shutdown at IP-3. A summary of the attached information follows.

A new Table 2-4 has been prepared from Table 2-1 to indicate the extent of detection and suppression in each fire area at IP-3.

Table 2-2 of the Reference (1) report has been revised to more clearly indicate the fire barriers credited in the evaluation of IP-3 to the requirements of Section III.G of Appendix R. The fire barriers which separate adjacent fire areas, protect fire areas from hazards in the yard area, and provide separation for specific plant components (as described in the Reference (1) report) will be controlled. The Technical Specifications will be revised to include any of these barriers not currently included in the license.

Several fire area boundaries include unrated penetrations as described in the notes to Table 2-2. In accordance with Generic Letter 85-01, these penetrations have been evaluated and found acceptable. The evaluations will be submitted for your information under separate cover.

As requested by the staff, the Authority has reviewed Section 4 of the Reference (1) report. This Section describes the operator actions which would be performed to achieve safe shutdown in the event of a fire which disables the normal plant control and instrumentation systems. The safe shutdown scheme and procedures are based on the available minimum shift manpower excluding those personnel dedicated to the fire brigade. While realistically the fire brigade's responsibilities for a fire event would be completed in a finite period of time and these people would be available to assist in plant shutdown, the Authority does not take credit for the two operations personnel assigned to the fire brigade for safe shutdown functions. Safe shutdown can be achieved utilizing only those personnel on shift who are not dedicated to the fire brigade.

Section 5 of the Reference (1) report has been revised to more clearly describe the modifications which the Authority has undertaken to address fire protection and safe shutdown at IP-3. The revised Section is included in Attachment 1.

Included in Attachment 2 hereto are two additional exemption requests from specific requirements of Section III.G.2 of Appendix R to 10 CFR 50. These exemptions are requested pursuant to 10 CFR 50.12 and relate to the Cable Tunnels (Fire Area ETN-4) and the Yard Area. The first addresses a stairway penetrating a fire barrier which the Authority has taken credit for in separating safe shutdown cabling in the upper and lower electrical penetration area of the cable

tunnels. The second exemption deals with the lack of detection and suppression systems in the yard area between the normal and backup Service Water Pumps.

The Authority hereby withdraws the exemption requested in Section 6.2.1(1) of Reference (1) for the safe shutdown instrumentation cables at the electrical tunnel entranceway from the Cable Spreading Room. Additional modifications are being completed during the current outage which will achieve compliance with Appendix R for these cables. The cables are being wrapped in a one hour barrier to a point within the Cable Tunnels where credit can be taken for the separation afforded by the floor/ceiling assembly located between fire zones 7A and 60A. Additional details regarding this modification and the basis for compliance with Appendix R in this Fire Area are provided in Attachment 2.

The Authority provided the Staff with information clarifying the as-built design of the Cable Tunnel sprinkler systems in Reference (3). The information addressed the conformance of the system to NFPA-13 in light of the NRC Safety Evaluation for the BTP 9.5-1, Appendix A review of IP-3. The modification to the Cable Tunnel sprinkler systems discussed in Reference (3) will be completed during the current refueling outage. The modification will result in these sprinkler systems conforming to the supervision requirements specified in the 1978 version of NFPA-13.

Reference (1) provided a discussion of Appendix R Sections III.J and It was noted in Reference (1) that implementation of modifications to achieve compliance with Sections III.G or III.L of Appendix R to 10 CFR 50 might necessitate modification of the emergency lighting system. It has been the Authority's position that compliance with Section III.J of Appendix R exists at IP-3. Modifications to the plant to install an additional onsite power supply to resolve NRC Staff positions on alternate shutdown necessitated the filing of an exemption from specific requirements of Section III.J in Reference (4) for the yard area. The modifications described in Section 5 of Reference (1), other than the new onsite emergency power supply, have not compromised the conformance of IP-3 to Section III.J of Appendix R. As with any system credited in the Appendix R evaluations, enhancements to the emergency lighting system may be made without affecting the original assessment of compliance to Section III.J.

Reference (5) provided an evaluation of the IP-3 Reactor Coolant Pump (RCP) oil collection system seismic capability. Based on a visual inspection of the oil collection system and the evaluation, it has been concluded that there is reasonable assurance that the system will withstand the Safe Shutdown Earthquake (0.15g for IP-3). Notwithstanding this evaluation, the Authority has undertaken modifications to the piping in the lower portion of the oil collection system, from the lower drip pan to the collection tank, to provide for a more permanent installation. Previously, the lower and upper piping systems were dismantled to conduct various maintenance activities on the reactor coolant pumps. The collection tanks are

also being replaced in conjunction with this work. The modification will result in a more permanent installation for the lower portion of the oil collection system which will facilitate future maintenance activities. The modification is being engineered and installed to withstand the SSE. The upper portions of the oil collection system will be unchanged and its seismic capability is described in Reference (5). The Authority concludes that the design of the RCP oil collection system installed at IP-3 provides reasonable assurance that the system will remain functional following the safe shutdown earthquake.

Attachment 3 provides clarifying information for the proposed exemption request for the charging pumps on the 55 foot elevation of the Primary Auxiliary Building. Construction features of the pump cubicals and corridor are described as well as the normal and alternate power cable routings. This information supports the exemption request submitted in Reference (1), Section 6.4.1. In addition, Attachment 3 includes information regarding separation of safe shutdown cables and equipment on the 34 foot elevation of the Primary Auxiliary Building (PAB) and at the motor control center area on the 55 foot elevation of the PAB.

Attachment 3 also includes the information requested by the staff during an August 28, 1985 meeting. Specifically, manual operation of certain motor operated valves following a fire and reactor coolant system make up water sources are described.

Indian Point 3 is currently shutdown for refueling and maintenance. The Authority is proceeding with the installation of the modifications described in the Reference (1) report. All modifications associated with alternate shutdown of the plant are scheduled to be completed within the schedule prescribed in 10 CFR 50.48.C.4 based on the termination of the tolling provisions of 10 CFR 50.48.C.6 by Reference (6). To the extent that the modifications other than those related to alternate shutdown, described in Reference (1) require a plant shutdown to install, the Authority intends to meet the schedule prescribed in 10 CFR 50.48.C.3 based on the termination of the tolling provisions of 10 CFR 50.48.C.6 by Reference (7).

The Authority had requested an exemption from the schedular requirements of 10 CFR 50.48.C, pursuant to 10 CFR 50.12, in Reference (1). The Authority reiterates this exemption request in the event that the Staff disagrees with our interpretation of the schedule requirements of 10 CFR 50.48.C. The requested schedule extension to the current refueling outage also applied to modifications on the 41 foot elevation of the PAB described in Section 5.3 of the Reference (1) report. The modification to install a noncombustible partial height barrier and the pump power cable wrapping is complete.

To the extent that the modifications to install the partial height barrier and cable wrapping are complete, the schedule exemption no longer applies. The Authority considers the schedular exemption necessary with regards to assessing compliance with 10 CFR 50.48.C unless the Staff determines otherwise. We trust you find this information satisfactory. If you have any questions, please call Mr. P. Kokolakis of my staff.

Very truly yours,

John C. Brons

Senior Vice President Nuclear Generation

cc: Resident Inspector's Office

Indian Point Unit 3

U.S. Nuclear Regulatory Commission

P.O. Box 66

Buchanan, NY 10511

#### ATTACHMENTS TO IPN-85-47

- 1. Revised pages to the Appendix R Section III.G Reevaluation Report submitted August 16, 1984.
- 2. Proposed Exemptions from Section III.G.2 of Appendix R to 10 CFR 50.
- 3. Additional Information Supporting the Exemption for the Charging Pumps on the Primary Auxiliary Building 55' Elevation, and Discussion of Safe Shutdown Equipment Separation on the 34' and 55' Elevations of the PAB.

NEW YORK POWER AUTHORITY

INDIAN POINT 3 NUCLEAR POWER PLANT

DOCKET NO. 50-286

### ATTACHMENT 1 IPN-85-47

REVISED PAGES TO THE APPENDIX R SECTION III.G REEVALUATION REPORT

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

- (e) Turbine Building (including portions of the Auxiliary Boiler Building) Fire Area TBL-5
- (f) Auxiliary Boiler Feedwater Pump Room Fire Area
  AFW-6
- (g) All other areas of the plant comprise the seventh Fire Area.

Revised combustible loadings including cable insulation, identification of external walls for fire areas and their adequacy, identification of fire area boundaries and their minimum required fire rating in accordance with the fire hazards present or expected, improvements in the detection and suppression systems, and use of fire barriers in III.G.2 areas were also defined.

### (3) Improved Alternative Shutdown Capability

Enhancements to the existing alternative shutdown capability at IP3 have been defined by:

- (a) An additional on-site ac alternative diesel generator independent from the emergency diesel generators, associated power distribution and existing support systems
- (b) Inclusion of additional alternative instrument indications for hot and cold leg temperatures and source range neutron flux
- (c) Steam generator pressure gauges at the atmospheric steam dump stations

### (4) Post-Fire Safe Shutdown

A manpower analysis was conducted that confirmed the adequacy of existing manpower at IP3 in coping with a fire requiring Control Room evacuation. The revisions of the plant emergency procedures reflect the additional safe shutdown flexibility provided by the enhanced alternative shutdown capability.

### (5) Appendix R Section III.G Compliance Documentation

A safe shutdown database was redefined based on the revised safe shutdown equipment, cables, and fire area boundaries. A computer-oriented separation analysis performed on a fire area basis identified additional Appendix R nonconformances for the Primary Auxiliary Building, cable tunnels, and Auxiliary Boiler Feedwater

#### 2.2.3 Controlled Barrier

A controlled barrier is a plant design feature that may or may not have an assigned fire resistive rating. However, in this analysis, controlled barriers have been credited with providing an acceptable level of protection in order to assure the availability of sufficient safe shutdown components and therefore must be under a surveillance control program. Examples of controlled barriers are the floor/ceiling assembly between the upper and lower cable tunnels, cable wrapping, partial height wall separating the CCW pumps and the radiant energy shields inside containment. Such barriers are identified in Table 2-3.

#### 2.2.4 Fire Area

That portion of a building or plant that is separated from other areas by boundary fire barriers. The rating of the barrier or boundary must exceed, with margin, the fire loading in the area. Fire area boundaries need not be completely sealed floor-to-ceiling, wall-to-wall boundaries. However, where such boundaries are not wall-to-wall, floor-to-ceiling boundaries with all penetrations sealed to the fire rating required of the boundaries, an evaluation will be performed to assess the adequacy of fire boundaries to determine if the boundaries will withstand the hazards associated with the area and protect important equipment within the area from a fire outside the area.

### 2.2.5 Fire Barrier

Those components of construction (walls, floors and their supports), including beams, joists, columns, penetration seals or closures, fire doors, and fire dampers that are rated by approving laboratories in hours of resistance to fire and are used to prevent the spread of fire. Fire barriers must be under a surveillance control program and all penetrations are to be sealed unless an engineering evaluation as defined in 2.2.4 above has been completed. Fire barriers are identified in Table 2-2.

### 2.2.6 Fire Resistance Rating

The time, in minutes or hours, that materials or assemblies have successfully withstood an exposure fire in accordance with test procedures of "Standard Methods of Fire Tests of Building Construction and Materials," NFPA STD-251[1].

(2) Material having a structural base that is noncombustible with a surface coating or layer that does not exceed 1/8-inch, and having a flame-spread rating not higher than 50 when measured using the ASTM E-84 Test, "Surface Burning Characteristics of Building Materials,"[2].

### 2.2.12 Penetration

A designed opening in a fire barrier, such as a floor, wall or ceiling, through which may pass conduit, cables, cable trays, piping, HVAC ducting, dampers, and similar equipment. Some penetration openings may not be sealed with fire-rated materials. However, all penetrations that do not have a fire rating equivalent to that required of the barrier will be identified and evaluated.

### 2.2.13 Radiant Energy Shield

A radiant energy shield is a barrier that resists heat energy and is constructed of noncombustible material. This shield may or may not have an assigned fire resistive rating. Such shields are found throughout Fire Area CNT-1 and those that protect redundant safe shutdown equipment must be under a surveillance control program.

### 2.3 Establishment of Fire Areas

Fire areas for this reevaluation were established to meet the fire protection requirements of Appendix R for safe shutdown systems. The previous fire hazards analyses were based on fire zones and sub-fire zones created for the sole purpose of facilitating the electrical system analysis, and not on the accepted fire protection definitions for fire areas or fire zones. Although exemption requests were accepted for the Control

## NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:23:23 15 AUG 1985 PAGE 1

Pare em⊕a.	Pine Zite	Description	Fire zone Boundary	External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary	
éfa <u>ré</u>	23	AUXILIARY BOILER FEED PUMF ROOM	CEILING		TBL-5	52A	0	1	
AFW-6	23	AUXILIARY BOILER FEED PUMP ROOM	EAST .	Y		YARD	0	0	
AFW-6		AUXILIARY BOILER FEED PUMP ROOM	FLOOR	Y		YARD	0	0	
AFW-6		AUXILIARY BOILER FEED PUMP ROOM	NORTH	Y		YARD	0		SEE TABLE 2-2 NOTE 4
				•	TBL-5	54A	0	1	
AFK-6		AUXILIARY BOILER FEED PUMP ROOM	SOUTH '	<b>Y</b> ,		YARD	0	0	
AFW-6	1	AUXILIARY   BOILER FEED   > PUMP ROOM	NEST )		. ,	/ARD	0	0	

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NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUND CHARACTERISTICS 10:48:54 31 JUL 1 PAGE

Fire area.	Fire Zone	Description	Fire zone Boundary	External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
DNT-1	70A	RCP AREA	FL00R	γ ·		YARD	0	0
DIT-1	71A	RCP AREA	FLOOR	γ ·		YARD	0	0
CNT-1	72A	OUTER ANNULUS	EAST		<del>PAB-</del> 2	59A	4	1
						90A	0	1
						91A	0	1
DNT-1	72A	OUTER ANNULUS	FL00R	Υ		YARD	0	0
DIT-1	72A	DUTER ANNULUS	SOUTH		PAB-2	59A	4	1
<b>.</b>		00/21/10/11202			PAB-2	622	Ö	1
			•		PAB-2	62A	0	1
CNT-1	75A	OUTER ANNULUS	FL00R	Y	-	YARD	0	0
<b>9</b> 2 (	<u>-</u> ,	OLOTED MALLIE	cormi	v	EDV-4	73A	62	•
DKT-1	/OA	OUTER ANNULUS	SOUTH	Y	ETN-4	YARD	0	2 2
^								
DNT-1	75A	OUTER ANNULUS	WEST	Y	TBL-5	57A	13	2
			•			YARD	0	2
			_		ETN-4	73A	62	2
DXT-1	76A	OUTER ANNILLUS	FL00R	Υ		YARD	0	0
CNT-1	746	OUTER ANNULUS	HEST	Y	TBL-5	57A	13	1
MI-1	/OH	DUTER HANDLOS	RCO1	1	IDL J	YARD	0	1
						•		
CNT-1	77A	OUTER ANNULUS	EAST	Y		YARD	0	0
CMT-1	77A	OUTER ANNULUS	FL00R	Y		YARD	0	0
ENT-1	77A	OUTER ANNULUS	NORTH	Y		YARD	0	0
<b>~</b> .	704	PERIODE ATTOM	D 000	Y		YARD	0	0
DIT-1	/8A	RECIRCULATION PUMPS AND RHR HEAT EXCHANGER	FLOOR	•	·	THE	v	V
DNT-1	<b>80</b> A	CONTAINMENT FAN COOLER AREA	SOUTH	Y		YARD	0	0
CNT-1	<b>8</b> 0A	CONTAINMENT FAN COOLER AREA	MEST	Υ .		YARD	0	0
DNT-1	BIA	CONTAINMENT FAN COOLER AREA	NORTH	Ÿ		YARD	0	0
CNT-1	81A	CONTAINMENT FAN COOLER AREA	WEST	Y	TBL-5	<b>57</b> A	13	1

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUTTY CHARACTERISTICS 10:48:57 31 JUL 10:48:57

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•	Fire area.	fire Zone	Description	Fire zone Boundary	External Nall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
							YARD	0	1
	CNT-1	<b>8</b> 2A	COOLER AREA	NORTH	Υ .		YARD	0	0
-	CNT-1	<b>8</b> 2A	CONTAINMENT FAN COOLER AREA	MEST	Y		YARD	0	0
	CNT-1	<b>83</b> A	CONTAINMENT FAN COOLER AREA	EAST	Y		YARD	0	0
	DNT-1	83A	CONTAINMENT FAN COOLER AREA	NORTH	Y		YARD	0	
	CMT-1	84A	CONTAINMENT FAN	EAST	Y		YARD	0	1
						PAB-2	<b>88</b> A	2	1
	ENT-1	<b>84</b> A	CONTAINMENT FAN	SOUTH	Y	PAD-2	<b>57</b> A	4	i
						PAB-2	88A Yard	2 0	1
	CNT-1	<b>8</b> 5A	INCORE DETECTOR DRIVE AREA	SOUTH	Y		YARD	0	0
	CNT-1	<b>8</b> 7A	DUTER ANNULUS	EAST	Υ		YARD	0	0
	CMT-1	<b>86</b> A	refueling floor Area	CEILING	Y		YARD	0	0
	DNT-1	86A	REFUELING FLOOR AREA	EAST	Y		YARD	0	0
	<b>CNT-1</b>	<b>8</b> 6A	refueling floor Area	NORTH	Y		YARD	0	0
	DNT-1	<b>8</b> 6A	REFUELING FLOOR AREA	SOUTH	Y		YARD	0	0 .
	CNT-1	<b>86</b> A	REFUELING FLOOR AREA	WEST	Y		YARD	0	0

# NEW YORK POWER AUTHORITY - INCIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:23:29 15 AUG 1985 PAGE

Fire are	a. Fi Zo	re Description ne	Fire zara Bourcen,	. Er†erze) 4231 - °	Adjacent Fore ares	Adjasent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary	
CTL-3	14	SWITCHBEAR RO	3M FL881	ţ.		YARD	O	e	
CTL-3	14	SWITCHSEAF RO	DM AUDIT					•	
0,2 0	44	OMITURGEHT RE.				66A	0	3	
						YARD	0	3	
		•				64A	·0	3	
						65A	0	3	
						67A	0	3	
CTL-3	14	SWITCHGEAR ROO	M SOUTH	Y		YARD	0	0	
CTL-3	14	SWITCHGEAR ROO	M WEST		TBL-5	<b>3</b> 7A	24	3	
CTL-3	33A	DELUGE VALVE ROOM	FLOOR	Y		YARD	0	0	
CTL-3	334	DELUGE VALVE ROOM	NORTH	Y		YARD	0	0	
CTL-3	334	DELUGE VALVE ROSM	WEST		TBL-5	37A	24	3	
CTL-3	<b>3</b> 5A	AIR CONDITIONING ROOM	<b>E</b> AST	Υ .		YARD	. 0	0	
CTL-3	<b>3</b> 5A	AIR CONDITIONING ROOM	NORTH	Y	,	YARD	0	0	
CTL-3	<b>34</b> A	FAN ROOM	CEILING	Y	١	(ARD	0	0	
CTL-3	<b>34</b> A	FAN ROOM	EAST	Y	١	(ARD	0	0	
CTL-3	34A	FAN ROOM	SOUTH	Y	Y	(ARD	0	0	
CTL-3	11	DABLE SPREADING ROOM	EAST	<sup>1</sup> .E	TN-4 6	·OΑ	<b>6</b> 3		EE TABLE 2-2
			·	Ε	TN-4 7	Á	56	N: 3	OTE 4
CTL-3	11	CABLE SPREADING ROOM	NORTH	•	Y.	ARD	0	0	
CTL-3		CABLE SPREADING ROSM	<b>S</b> OUTH Y		Yi	ARD	0	0	
CTL-3		CABLE SPREADING ROOM	WEST	T:	8L-5 4;	3A	. 11		E TABLE 2-2 PTE 4
CTL-3	12	BATTERY ROOM 31	SOUTH Y		Yf	ARD	ů	0	

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNT CHARACTERISTICS 10:49:02 31 JUL 1

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Fire area.	Fire Zone	Description	Fire zone Boundary	External Mall	Adjacent Fire <b>are</b> a	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
CTL-3	13,	BATTERY ROOM 32	SOUTH	Y	•	YARD	0	0
CTL-3	15	CONTROL ROOM	CEILING	Y		YARD	0	0
CTL-3	15	CONTROL ROOM	NORTH	Y		YARD	0	0
CTL-3	15	CONTROL ROOM	SOUTH	Y		YARD	0	0
CTL-3	15	CONTROL ROOM	WEST		TBL-5	49A	i	3
CTL-3	10	DG NO. 31 ROOM	CEILING	Y		YARD	0	0
CTL-3	10	DG NO. 31 ROOM	FL00R	Y		YARD	0	0
CTL-3	10	DG NO. 31 ROOM	SOUTH	<b>Y</b>	• .	YARD	0	0
CTL-3	10	DG NO. 31 ROOM	WEST	Y		YARD	0	0
CTL-3	101A	DIESEL SENERATOR ROOM NO. 32	CEILING	Y		YARD	0	0
CTL-3	101A	DIESEL SENERATOR ROOM NO. 32	FL00R	Y		YARD	0	0
CTL-3	101A	DIESEL GENERATOR ROOM NO. 32	SOUTH	Y		YARD		0
CTL-3	102A	DIESEL SEDIERATOR ROOM NO. 33	CEILING	<b>Y</b>		YARD	0	0
CIL-3	102A	DIESEL SENERATOR ROOM NO. 33	EAST	Y		YARD	0	0
CTL-3	102A	DIESEL SENERATOR ROOM NO. 33	FLOOR	Y		YARD	<b>0</b>	0
CTL-3	102A	DIESEL GENERATOR ROOM NO. 33	<b>SO</b> UTH	Y		YARD	0	0 .
CTL-3	36A	SUMP AND PUMP ROOM	EAST	<b>У</b>		YARD	0	0 .

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUT Y CHARACTERISTICS 10:49:04 31 JUL PAGE 6

Fire area.	Fire Zone	Description	Fire zone Boundary	External Mall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
CTL-3	36A	SUMP AND PUMP ROOM	FL00R	Y		YARD	0	0
CTL-3	36A	SUMP AND PUMP ROOM	SOUTH	<b>Y</b>		YARD	0	0

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## NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:23:34 15 AUG 1985 PAGE 7

Fig. 2	Fire are	a. Fii Zoi	re Description	. Fire zone Boundary	External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary	
PAB-2	ETN-4	7A				PÁB-2	<b>4</b> A	1	,2	
PAB-2						PAB-2	58A	4	2	
PAB-2										
PAB-2   9   1   2   2   2   2   2   2   2   2   2								•		
FAB-2	,							-		
FIN-4								-		
PAB-2	ETN-4	7A		FLOOR		PAB-2	10A	0	2	
PAB-2						PAR-2	140	2	•	
FAB-2   SA   0   2										
ETN-4 7A ELECTRICAL TUNNEL (LOMER) SOUTH Y YARD 0 0 0  ETN-4 7A ELECTRICAL TUNNEL (LOMER) SOUTH Y YARD 0 0 0  ETN-4 7A ELECTRICAL TUNNEL (LOMER) SOUTH Y PAB-2 622 0 3 SEE TABLE 2-2 NOTE 4  ETN-4 7A ELECTRICAL PENETRATION AREA (LOMER) FUNCTIONAL PENETRATION AREA (LOMER) TEL-5 524 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) TEL-5 524 0 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) TEL-5 524 0 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) TEL-5 524 0 0 0  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) FUNCTIONAL PENETRATION AREA (LOMER) TEL-5 524 0 0 0  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) SOUTH Y YARD 0 0 0  ETN-4 74A ELECTRICAL PENETRATION AREA (LOMER) FUNCTIONAL PENETRATION AREA (										
TUNNEL (LOMER)  ETN-4 7A ELECTRICAL TUNNEL (LOMER)  ETN-4 7A ELECTRICAL TUNNEL (LOMER)  TOTL-3 11 143 3 SEE TABLE 2-2 NOTE 4  65A 0 3 SEE TABLE 2-2 NOTE 4  FENT-4 74A ELECTRICAL PLOWER)  ETN-4 74A ELECTRICAL PLOWER)  ETN-4 74A ELECTRICAL PORTH Y YARD 0 0  ETN-4 74A ELECTRICAL PORTH Y YARD 0						FMD-Z	<b>SH</b>	U	2	
TUNNEL (LOWER)   LOWER   LECTRICAL TUNNEL (LOWER)   LOWER	ETN-4	7A		NORTH		PAB-2	622	0	2	
TUNNEL (LOWER)  TUNNEL (LOWER)  65A 0 3 67A 0 3  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  TEN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  TEL-5 52A 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  TEL-5 52A 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  TEL-5 52A 0 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  67A 0 0  2	ETN-4	7A		SOUTH	Y		YARD	0	0	
ETN-4	ETN-4	7A		WEST		CTL-3	11	143		
ETN-4 74A ELECTRICAL PEAST Y PAB-2 622 0 2  ETN-4 74A ELECTRICAL PEAST Y PAB-2 622 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  TBL-5 52A 0 2  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  TBL-5 52A 0 0  ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER)  FIN-4 74A ELECTRICAL PENETRATION AREA (LOWER)				>			65A	Q		
PENETRATION AREA (LOWER)  ETN-4 74A ELECTRICAL PLOOR Y YARD 0 0  ETN-4 75A ELECTRICAL PENETRATION AREA (LOWER)  TEN-5 52A 0 2  ETN-4 75A ELECTRICAL PENETRATION AREA (LOWER)  TEL-5 52A 0 0 2  ETN-4 75A ELECTRICAL PENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  TEL-5 52A 0 0 2  ETN-4 75A ELECTRICAL PENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  67A 0 0  ETN-4 75A ELECTRICAL PENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)  FENETRATION AREA (LOWER)							<b>6</b> 7A	0		
FENETRATION AREA (LOWER)  ETN-4 744 ELECTRICAL PENETRATION AREA (LOWER)  TBL-5 52A 0 2  ETN-4 74A ELECTRICAL SOUTH Y YARD 0 0  ETN-4 74A ELECTRICAL SOUTH Y FENETRATION AREA (LOWER)  ETN-4 74A ELECTRICAL WEST Y 65A 0 2  ETN-4 74A ELECTRICAL WEST Y 65A 0 2  ETN-4 74A ELECTRICAL WEST Y 65A 0 2	ETN-4	74A	PENETRATION	EAST	Y	PAB-2	622	0	2	
PENETRATION   AREA (LOWER)   TBL-5   52A   0   2		7 <b>4</b> A	PENETRATION	FLOOR	Y	,	YARD	0	C	
ETN-4 744 ELECTRICAL SOUTH Y YARD 0 0  ETN-4 744 ELECTRICAL WEST Y 65A 0 2  ETN-4 744 ELECTRICAL PENETRATION AREA (LOWER)  67A 0 2	ETN-4	744	PENETRATION	NORTH	Y		YARD	0	2	
ETN-4 74A ELECTRICAL PENETRATION AREA (LOWER) SOUTH Y YARD 0 0  ETN-4 74A ELECTRICAL WEST Y 65A 0 2  FENETRATION AREA (LOWER) 67A 0 2					•	TBL-5 5	52A .	0	2	
ETN-4 74A ELECTRICAL WEST Y 65A 0 2 PENETRATION AREA (LOWER) 67A 0 2	ETN-4	744	ELECTRICAL PENETRATION	SOUTH Y	í	<b>)</b>	(ARD	0	0	
PENETRATION AREA (LOWER) 67A 0 2						6	7A	0	0	
67A 0 2	ETW-4	744	PENETRATION	WEST Y	′	6	5A	0	2	
·						4	70	۵	a ·	
TRILES FOR A									2	
					7			0	2	

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## NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:23:37 15 AUG 1985 PAGE 8

Famo erea	, Fir Zor	e Description	. Fire zone Boundary	Externa? Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundar y	Remarks
ETN-4	£04	ELECTRICAL TURNEL (UPPER)	CEILING		PAB-2	17A	8	2	
		TOTALL TOTAL			PAR-2	<b>63</b> A	0	2	
ETN-4	404	ELECTRICAL TUNNEL (UPPER)	EAST		PAB-2	<b>58</b> A	4	2	
					PAB-2 PAB-2	5A 622	0	2 2	
ETN-4	60A	ELECTRICAL TUNNEL (UPPER)	NORTH		PAB-2	622	0	2	
ETN-4	60A	ELECTRICAL TUNNEL (UPPER)	SOUTH	Υ .		YARD	0	0	
ETN-4	60A	ELECTRICAL TUNNEL (UPPER)	WEST		CTL-3	11	143		SEE TABLE 2-2 NOTE 4
						65A 67A	0 0	3 3	
ETN-4	73A	ELECTRICAL PENETRATION AREA (UPPER)	CEILING	Y		YARD	0	0	
ETN-4	73A	ELECTRICAL PENETRATION AREA (UPPER)	EAST		FAB-2	59A	4	2 .	
						622 75A	0 105	2 2	
ETN-4	73A	ELECTRICAL PENETRATION AREA (UPPER)	NORTH		TBL-5	57A	13	2	
			,	(	CNT-1	<b>75</b> A	105	2	
ETN-4	734	ELECTRICAL PENETRATION AREA (UPPER)	SOUTH	Y		55A	0	0	
	•					ARD 7A	0	0	
ETN-4		ELECTRICAL PENETRATION APEN (UPPER)	WEST		ſBL+5 5	77A	13	2	
					6	ARD SA 7A	0 0 0	2 2 · 2	

NEW YORK POMER AUTHORITY - INDIAN POINT 3 NUCLEAR POMER PLANT TABLE 2-2 FIRE AREA BOX RY CHARACTERISTICS 10:49:09 31 JL

Fire area. Fire Description.... Fire zone... External Adjacent.... Adjacent Adjacent ..... Minimum. Zone Fire Boundary Mall Fire area

Area Zone

Fire zone Boundary Fire severity Rating (minutes) Required

(hr)

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT

TABLE 2-2 FIRE AREA BOUNDY CHARACTERISTICS 10:49:09 31 JUL 1 PAGE 10

Fire <b>area.</b>	Fire Zone	Description		External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
PAB-2	10A	WALVE CORRIDOR	CEILING	•	ETN-4	7A	56	2
PAB-2	10A	VALVE CORRIDOR	FL00R	Y		YARD	0	0
PAB-2	10A	WALVE CORRIDOR	MEST	Y		YARD	0	0
PAB-2	11A	SUMP TANK AND PUMP ROOM	FL00R	Y		YARD	0	0
PAB-2	12A	CORRIDOR PAB ELEV. 15-0	EAST	Y		YARD	0	0
PAB-2	12A	CORRIDOR PAB ELEV. 15-0	FL00R	Y		YARD	Ò	0
PAB-2	13A	LARGE GAS DECAY TANK ROOM	EAST	Y	·	YARD	0	0
PAB-2	13A	LARGE GAS DECAY TANK ROOM	FL00R	Y		YARD	0	0
PAB-2	13A	LARGE GAS DECAY TANK ROOM	SOUTH	Y		YARD	0	0
PAB-2	14A	CORRIDOR PAB ELEV 15-0	CEILING .		ETN-4	7A	<b>56</b> °	2
PAB-2	14A	CORRIDOR PAB ELEV 15-0	FL00R	Y		YARD	0	0
PAB-2	14A	CORRIDOR PAB ELEV 15-0	SOUTH	Y		YARD	0	0
PAB-2	144	CORRIDOR PAB ELEV 15-0	WEST	Y	•	YARD	0 .	0
PAB-2	15A	SPENT RESIN STURAGE TANK ROOM	CEILING		ETN-4	7A	56	2
PAB-2	15A	SPENT RESIN STORAGE TANK ROOM	FL00R	Y		YARD	0	0
PAB-2	15A	SPENT RESIN STURAGE TANK ROOM	<b>SOUTH</b>	Y		YARD	0	0
PAB-2	15A	SPENT RESIN	MEST	Y		YARD	0	0 .

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUTTY CHARACTERISTICS 10:49:12 31 JUL

Fire area.	Fire Zone	Description	Fire zone Boundary	External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
		STORAGE TANK ROOM		·				
PAB-2	16A	CHEMICAL DRAIN TANK ROOM	FL00R	Y		YARD	0	0
PAB-2	16A	CHEMICAL DRAIN	SOUTH	Y		YARD	0	0
PAB-2	3	RHR PUMP ROOM 31	FL00R	Y		YARD	0	0
PAB-2	3	RHR PUMP ROOM 31	NORTH	Y		YARD	0	0
PAB-2	4	RHR PUMP ROOM 32	EAST	Y		YARD	0	0
PAB-2	4	RHR PUMP ROOM 32	FL00R	<b>Y</b>		YARD	0	0
PAB-2	4	RHR PUMP ROOM 32	NORTH	Y		YARD	0	0
PAB-2	69A	PIPING AND VALVE ROOM	FL00R	Y		YARD	0	0
PAB-2	69A	PIPING AND VALVE ROOM	NORTH	<b>Y</b>		YARD	0	0
PAB-2	<b>BA</b>	EMPTY ROOM	CEILING		ETN-4	7A ·	56	2
PAB-2	BA	EMPTY ROOM	FL00R	Y		YARD	0	0
PAB-2	BA	EMPTY ROOM	NORTH	Υ .		YARD	0	0
PAB-2	<b>8</b> A	EMPTY ROOM	MEST	Υ .		YARD	0	0
PAB-2	<b>9</b> A	RHR FUTURE PUMP ROOM	FL00R	Y		YARD	0	0
PAB-2	<b>9</b> A	RHR FUTURE PUMP ROOM	NORTH	Y		YARD	0	0
PAB-2	<b>5</b> A	PIPING TUNNEL	EAST	Y			0	0
PAB-2	<b>5</b> A	PIPING TUNNEL	NORTH	Y		YARD	0	0
PAB-2	<b>5</b> A	PIPING TUNNEL	MEST		ETN-4	7A	56	2

MEN YURK PUNER MUSH	ואנטים אאנשאני - דונאשו	3 MULLERY	PURCK FLHIN		
TABLE 2-2 FIRE AREA BOUNDARY CHA	ARACTERISTICS 1	10:49:14	31 JL 485	PAGE	12

Fire area.	Fire Zone	Description	Fire zone Boundary	External Nall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
					ETN-4	<b>60A</b>	<b>63</b>	2
PAB-2	<b>4</b> A	CORRIDOR	MEST		ETN-4	7A	56	2
PAB-2	<b>68</b> A	ION EXCHANGE COLUMN ROOM	<b>90</b> UTH	Y		YARD	0	0
PAB-2	<b>68</b> A	ION EXCHANGE COLUMN ROOM	MEST		ETN-4	7A	56	2
PAB-2	9	SAFETY INJECTION PUMP ROOM	NEST		ETN-4	7A	56	2
PAB-2	2	CONTAINMENT SPRAY PUMP ROOM	EAST	<b>Y</b> ,		YARD	0	0
PAB-2	2	Containment Spray Pump Room	FLOOR	<b>Y</b> .		YARD	0	0
PAB-2	2	CONTAINMENT SPRAY PUMP ROOM	<b>SOUTH</b>	Y		YARD	0	0
PAB-2	<b>3</b> A	PIPING TUNNEL	EAST	Y		YARD	0	0
PAB-2	<b>3</b> A	PIPING TUNNEL	FL00R	Y		YARD	<b>0</b> .	0
						<b>98</b> A	0	0
PAB-2	1	CON PUMP ROOM	FLOOR	Y		YARD	0	0
PAB-2	1	CCN PUMP ROOM	NORTH	<b>Y</b>		YARD	0	0
PAB-2	1A	Flash Evaporator Room	<del>-</del>	Y	·	YARD	0	0
PAB-2	1A	Flash Evaporator Room		Y		YARD	0	0
PAB-2	1A	Flash Evaporator Room	į.	Y		YARD	0	0
PAB-2	2A	PRIMARY MAKEUP MATER PUMP ROOM		Y		YARD	0	0
PAB-2	2A	PRIMARY MAKEUP MATER PUMP ROOM		Y		YARD	0	0
PAB-2	<b>58</b> A	PIPING TUNNEL	FL00R	Y		YARD	0	0

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUND CHARACTERISTICS 10:49:16 31 JUL 1 PAGE 13

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Fire area.	Fire Zone	Description		External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (ainutes)	Boundary
<del>PAB-</del> 2	<b>58</b> A	PIPING TUNNEL	MEST		ETN-4 ETN-4	7A 60A	56 63	2 2
PAB-2	17A	CORRIDOR	FL00R		ETN-4	<b>60</b> A	63	2.
PAB-2	17A	CORRIDOR	NORTH	Y		YARD	0	0
PAB-2	17A	CORRIDOR	SOUTH	Y		YARD	0 .	0
PAB-2	17A	CORRIDOR	HEST	Y		YARD	0	0
PAB-2	18A	Waste Gas Compressor Room	<b>SO</b> UTH	Y		YARD	0	0
PAB-2	19A	WASTE EVAPORATOR ROOM	SOUTH	Υ .		YARD	0	0
PAB-2	21A	MASTE STORAGE AND DRUMMING AREA	NORTH	<b>Y</b>		YARD	0	0
PAB-2	5	CHARGING PUMP ROOM 31	NORTH	Y		YARD	0	0
PAB-2	6	CHARGING PUMP ROOM 32	NORTH	Y		YARD	0	0
PAB-2	<b>63</b> A	MASTE CONDENSATE TANK ROOM	CEILING	Y		YARD	0	0
PAB-2	<b>63</b> A	WASTE CONDENSATE TANK ROOM	FL00R		ETN-4	<b>6</b> 0A	63	2
PAB-2	63A	NASTE CONDENSATE TANK ROOM		Y			0	0
PAB-2	63A	WASTE CONDENSATE TANK ROOM		Y		YARD	0	0
PAB-2	7	CHARGING PUMP ROOM 33	NORTH	Y		YARD	0	0
PAB-2	8	BORIC ACID TANK AREA	EAST	Y			0	0

## NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOULD Y CHARACTERISTICS 10:49:18 31 JUL PAGE 14

Fire area.	Fire Zone	Description	Fire zone Boundary	External Wall		Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
PAB-2	8	BORIC ACID TANK AREA	NORTH	<b>Y</b>	,	YARD	0	0.
PAB-2	<b>22</b> A	BORIC ACID EVAPORATOR ROOM 32	CEILING	<b>Y</b>		YARD	0	0
PAB-2	<b>22</b> A	BORIC ACID EVAPORATOR ROOM 32	SOUTH	Y		YARD	.0	0
PAB-2	<b>23</b> A	ENTRY FOR ZONES 22A AND 24A	CEILING	Y		YARD	0	0
PAB-2	23A	ENTRY FOR ZONES 22A AND 24A	SOUTH	Y	·	YARD	0	0
PAB-2	24A	BORIC ACID EVAPORATOR ROOM 31	CEILING	Y		YARD	0	0
PAB-2	24A	BORIC ACID EVAPORATOR ROOM 31	<b>50</b> UTH	Y		YARD	0	0
PAB-2	<b>25</b> A	SEAL WATER HEAT EXCHANGER ROOM	CEILING	<b>Y</b> .		YARD	0	0
PAB-2	<b>25</b> A	SEAL NATER HEAT EXCHANGER ROOM	SOUTH	Y		YARD	0	0
PAB-2	25A	SEAL NATER HEAT EXCHANGER ROOM	NEST	Y		YARD	0	0
PAB-2	26A	REACTOR COOLANT FILTER	CEILING	Y	·	YARD	· <b>o</b>	0
PAD-2	26A	REACTOR COOLANT FILTER	NORTH	Y		YARD	0	0
PAB-2	26A	REACTOR COOLANT FILTER	MEST	Y	v.*	YARD	0	0
PAB-2	27A	CORRIDOR PAB ELEV. 73-0	CEILING	<b>.Y</b>		YARD	0	0
PAB-2	27A	CORRIDOR PAB ELEV. 73-0	EAST	Y		-	0	0

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUND CHARACTERISTICS 10:49:20 31 JUL 1 PAGE 15

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	Fire area.	Fire Zone	Description		External Mall			Adjacent Fire zone Fire severity (minutes)	Boundary
	PAB-2	27A	CORRIDOR PAB ELEV. 73-0	NORTH	Y		YARD	0	<b>O</b>
	PAB-2	<b>28</b> A	VALVE CORRIDOR	CEILING	Y		YARD	0	0
	PAB-2	29A	VOLUME CONTROL TANK ROOM	CEILING	Y		YARD	0	0 -
	PAB-2	29A	VOLUME CONTROL TANK ROOM	NORTH	Y		YARD	0	0
	PAB-2	<b>3</b> 0A	VALVE CORRIDOR	CEILING	Y		YARD ,	0	0
	PAB-2	<b>3</b> 0A	VALVE CORRIDOR	NORTH	Y		YARD	0	0
	PAB-2	31A	CONCENTRATE HOLDING TANK ROOM	CEILING	Y		YARD	0	0
	PAB-2	31A	CONCENTRATE HOLDING TANK ROOM	NORTH .	Y		YARD	0	0
	PAB-2	32A	NON-RESEMERATIV E HEAT EXCHANGER ROOM	CEILING	Y		YARD	0	0
	PAB-2	32A	NON-REGENERATIV E HEAT EXCHANGER ROOM	NORTH	Y		YARD	0	0
	PAB-2	<b>89</b> A	STORAGE AREA	CEILING	Y		YARD	0	0
	PAB-2	<b>8</b> 9A	STURAGE AREA	EAST	Y			0	0
	PAB-2	<b>89</b> A	STURAGE AREA	SOUTH	Y			0	0
	PAB-2	61A	PIPING TRENCH	EAST	Y		YARD	0	0
	PAB-2	61A	PIPING TRENCH	FL00R	Y		YARD	0	0
	PAB-2	61A	PIPING TRENCH	NORTH	Y	•	YARD	0	0
	PAB-2	622	BORON INJECTION	FLOOR	<b>Y</b>		YARD	0	0
	PAB-2	622	BORON INJECTION	NORTH		CMT-1 ·	72A	5	1

•		TABLE	NEW YOR 2-2 FIRE AREA!	POWER AUTHOR				OMER PLANT JUL 1885 PAGE	16
	Fire area.	Fire Zone	Description	Fire zone Boundary		Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
	PAB-2	622	BORON INJECTION	SOUTH		ETN-4	60A	63	2
				• .		ETN-4	7A	56	2
	PAB-2	622	BORON INJECTION	WEST		ETN-4	7A	56	2
	*					ETN-4	60A	63	2
						ETN-4	73A	62	2
						ETN-4	7 <b>4</b> A	39	2
	PAB-2	79A	STEAM GENERATOR BLONDOWN TANK	FL00R	Y		YARD	Ó	0
	PAB-2	<b>62</b> A	PIPING TRENCH	FL00R	Y		YARD	0	0
	PAB-2	62A	PIPING TRENCH	NORTH		CNT-1	72A	5	1
	PAB-2	5 <del>7</del> A	PIPING PENITRATION AREA	EAST	Y		<b>90</b> A	0	Ó
			,				91A	0	0
							YARD	0	0
	PAB-2	59A	PIPING PENITRATION AREA	FL00R	Y		YARD	0	0 .
	PAB-2	59A	PIPING PENITRATION AREA	NORTH		CNT-1	72A	5	1
			MINEN			CNT-1	84A	0	1
,	PAB-2	59A	PIPING PENITRATION AREA	WEST		CMT-1	72A	5	2
			THE STATE OF THE S			ETN-4	73A	62	2
	PAB-2	<b>88</b> A	PAB FSB AND CONTAINMENT VENTILATION SYSTEMS AREA	CEILING	Y		YARD	0	0
								_	

PAB-2

PAB-2

PAB FSB AND

CONTAINMENT VENTILATION SYSTEMS AREA

88A PAB FSB AND

EAST

NORTH

**9**0A

91A

87A

10

CNT-1

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NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUND CHARACTERISTICS 10:49:25 31 JUL 1 PAGE 17

Fire area.	Fire Zone	Description	Fire zone Boundary		Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
		CONTAINMENT VENTILATION SYSTEMS AREA			DNT-1	84A	0	1
PAB-2	<b>88</b> A	PAB FSB AND CONTAINMENT VENTILATION SYSTEMS AREA	SOUTH	Y		YARD	0	0

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# NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:23:56 15 AUG 1985 PAGE 18

								- •	
Fire an	ea. F: Z:	ire Description one	Fire zone. Boundary	Externa Wall	l Adjacent Fire area	. Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary	
TBL-5	52	A CHEMICAL ADDITION AREA	EAST	Y	ETN-4	7 <b>4</b> A	39	2	
						YARD	0	2	
TBL-5	52	A CHEMICAL ADDITION AREA	FLOOR		AFW-6	23	6	1	
TBL-5	52	A CHEMICAL ADDITION AREA	SOUTH	Y	ETN-4	7 <b>4</b> A	39	1	
						YARD	0	1	
TPL-5	524	ADDITION AREA	WEST	Υ .		YARD	0	0	
TBL-5	574	MAIN STEAM AND FEEDWATER VALV AREA	CEILING	<b>Y</b> .		YARD	0	0	
TBL-5	57A	MAIN STEAM AND FEEIWATER VALV AREA			CNT-1	75A	105	2	
						76A	41	2	
						73A 81A	62 0	2 2	
TBL-5	57A	MAIN STEAM AND FEEDWATER VALVE AREA		<b>Y</b>	ETN-4	73A	62	2	
					•	YARD	0	2	•
TBL-5	57A	MAIN STEAM AND FEEDWATER VALVE AREA		Y		YARD	0	0	·
TEL-5	<b>54</b> A	MAIN BOILER FEEDWATER REGULATOR AREA	EAST	γ –		YARD	0	0	,
TBL-5	54A	MAIN BOILER FEELWATER REBULATOR AREA	FLOOR	Y	Y	(ARI)	0	0	
TBL-5	544	MAIN BOILER FEEDWATER REGULATOR AREA	NOPTH	Y .	Y	'ARD	0	0	
		·			5	54	0	0	
TBL-5		MAIN BOILER FEEDWATER	SOUTH	Y A	FW-6 2	3	6		E TAPLE 2-2 TE 4

NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT
TABLE 2-2 FIRE AREA BOUNDAM CHARACTERISTICS 10:49:27 31 JUL 1982 19

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Fire area.	Fire Zone	Description	Fire zone Boundary	External Wall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
		REGULATOR AREA						
TBL-5	<b>53</b> A	FEEDMATER BYPASS REGULATOR PLATFORM	CEILING	. <b>Y</b> .		YARD	0	0
TBL-5	<b>53</b> A	FEEDMATER BYPASS REGULATOR PLATFORM	EAST	Y		YARD	0	0
TBL-5	<b>53</b> A	FEEDMATER BYPASS REGULATOR PLATFORM	NORTH	Y		YARD	0	0
TBL-5	53A	FEEDNATER . BYPASS REGULATOR PLATFORM	SOUTH	Y		YARD	0	0
TBL-5	<b>53</b> A	FEEDMATER BYPASS REGULATOR PLATFORM	WEST	Y	·	YARD	0	0
TBL-5	16	TURBINE OIL RESERVOIR AREA	FL00R	Y		YARD	0	0
TBL-5	16	TURBINE OIL RESERVOIR AREA	NORTH	Y		YARD	0	0
TBL-5	17	TURBINE OIL RESERVOIR AREA	EAST				0	0
TBL-5	17	TURBINE DIL RESERVOIR AREA	FL00R	Y		YARD	0	0
TBL-5	18	TURBINE LUBE OIL COND. AREA	FL00R	Y		YARD	<b>,0</b>	0
TRL-5	19	STATION AIR COMPRESSOR AREA		Y		YARD	0	0
TBL-5	19	STATION AIR COMPRESSOR AREA		Y		YARD	<b>'0</b>	0
TBL-5	20	BOILER FEED	FL00R	Y		YARD	0	0

## NEW YORK POWER AUTHORITY - INDIAN POINT 3 NUCLEAR POWER PLANT TABLE 2-2 FIRE AREA BOUNDARY CHARACTERISTICS 15:24:01 15 AUG 1985 PAGE 20

Fire	anea. Fi Zo	ire Description one	. Fire zone Boundary	. Externa Wall	l Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	-Bounda• y	
7B1-5	19	STATION AIR COMPRESSOR ARE	WEST A	у		YARD	0	0	
TEL-5	20	BOILER FEED PUMP LUBE OIL RESERVOIR	FLOOR	Y		YARD	0	0	
TBL-5	21	HYDROGEN SEAL DIL RESERVDIR	FLOOR	Y		YARD	0	0	
TBL-5	374	6ROUND FLOOR	EAST		CTL-3 CTL-3	14 33A 64A 66A	34 0 0	3 3 3 3	
TRL-5	<b>3</b> 7A	GROUND FLOOR	FL00R	y		YARD	0	()	
TRL-5	<b>3</b> 7A	GROUND FLOOR	SOUTH	Y			0	0	
TPL-5	38A	GROUND FLOOR	FLOOR	Y		YARD	0	0	
TBL-5	<b>3</b> 64	GROUND FLOOR	SOUTH .	Y			0	0	
TBL-5	38A	GROUND FLOOR	WEST	Y		YARD	0	0	
TBL-5	394	GROUND FLOOR	FLOOR	Y		YARD	0	0	
TBL-5	39A	GROUND FLOOR	WEST	Y		YARD	0		
TBL-5	<b>4</b> 0A			Y		64A YARD	0	0 0	
TEL-5	40A	GROUND FLOOR	FLOOR Y	ľ		YARD	0	0	
TB1-5	41A	GROUND FLOOR	FLOOR Y	1		YARD	. 0	0	
181-5	416	GROUND FLOOR	<b>N</b> ORTH Y	,		YARD	0	0	
TPL-5	<b>4</b> 1A	GROUND FLOOR	WEST Y	•		YARD	0	e	
TB1-5	424	GROUND FLOOR (	EAST Y			YARD	0		
TBL-5	<b>4</b> 2A	GROUND FLOOR F	FLOOR Y			YARD		0	
TBL-5			NORTH Y			YARD	0 ′ 0	0	
TRL-5	434	MEZZANINE FLOOR E					143		E TABLE 2+2 TE <b>4</b>

TABLE 2-2 FIRE AREA BOUNDAM HARACTERISTICS

10:49:32 31 JLL 198 PAGE 21

Fire area.	Fire Zone	Description	Fire zone Boundary	External Mall	Adjacent Fire area	Adjacent Fire Area Zone	Adjacent Fire zone Fire severity (minutes)	Boundary
TBL-5	44A	MEZZANINE FLOOR	WEST	Y		YARD	0	0
TBL-5	<b>45</b> A	MEZZANINE FLOOR	CEILING	Y		YARD	0	0
TBL-5	45A	MEZZANINE FLOOR	WEST	Y		YARD	0	0
TBL-5	46A	MEZZANINE FLOOR	EAST	Y		64A YARD 66A	0 0 0	0 0 0
TBL-5	47A	MEZZANINE FLOOR	EAST	Y		YARD	0	0
TBL-5	47A	MEZZANINE FLOOR	NORTH	Y		YARD	0	. 0
TBL-5	47A	MEZZANINE FLOOR	NEST	Y		YARD	0	0
TBL-5	48A	LOADING WELL	CEILING	Y		YARD	0	0
TBL-5	<b>48</b> A	LOADING WELL	NORTH	Y		YARD	0	0
TBL-5	48A	LOADING WELL	MEST	Y		YARD	0	0
TRL-5	49A	TURBINE FLOOR	CEILING	Y		YARD	0 .	0
TBL-5	49A	TURBINE FLOOR	EAST	Y	CTL-3	15 Yard	0 0	3 3
TBL-5	49A	TURBINE FLOOR	SOUTH	Y			0	0
TBL-5	49A	TURBINE FLOOR	WEST	Y		YARD	0	0
TBL-5	<b>5</b> 0A	TURBINE FLOOR	CEILING	Y		YARD	0	0
TBL-5	<b>50</b> A	TURBINE FLOOR	EAST	Y		YARD	0	0
TBL-5	, <b>50</b> A	TURBINE FLOOR	NEST	Y		YARD	0	0
TBL-5	51A	TURBINE FLOOR	CEILING	Y		YARD	0	0
TBL-5	51A	TURBINE FLOOR	EAST	Y		YARD	0	0
TBL-5	51A	TURBINE FLOOR	NORTH	Y	٠.	YARD	0	. 0
TBL-5	51A	TURBINE FLOOR	WEST	<b>Y</b> ·		YARD	0	0

### TABLE 2-2 NOTES

- Adjacent fire zone boundaries that are identified as the Yand may be either partially or fully exposed to the exterior of the building.
- 2. The floor of a fire zone boundary that is identified as the Yard is defined as exposed to the ground with no lower elevations.
- 3. Minimum fire rating is based on the combustible loading for the fire zones that are immediately adjacent to the fire area boundary and represent the worst case of combustible fuel loading in the fire area. The minimum fire rating considers the fire severity for future modifications and is rounded off to the next highest fire resistive rating. The fire resistive rating is defined in Section 2.2.6.
- 4. Fire area boundaries with reference to this note include unrated penetrations which have been evaluated and found acceptable in accordance with NRC Generic Letter 85-D1.

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:06 07 AUG 1985 PAGE

Fire area Fire zone Description... Building... Elevation Detector Detector remarks Extinguishing.. Extinguishing.. System Remarks C.S. TANK C.S. TANK 552 70-0 553 C.S. TANK C.S. TANK 70-0 C.S.T. PIPING C.S.T. 67-8 554 **PIPING** 56A DE-ICING PIT DE-ICING PIT 2-0 222 BACK-UP SERVICE DISCHARGE WATER PLIMP CANAL 90A SPENT FUEL POOL FUEL STORAGE 41-0 CO2 MANUAL **EQUIPMENT AREA EXTINGUISHER** HOSE LINE 91A NEW AND SPENT FUEL STORAGE 55-0 CO2 MANUAL FUEL STORAGE **EXTINGUISHER** HOSE LINE SCREEN WELL 22 INTAKE 15-0 HYDRANT HOSE AREA STATION SCREEN WELL 55A. INTAKE 15-0 CO2 MANUAL AREA **EXTINGUISHER** HYDRANT HOSE STATION 106A REFUELING WATER REFUELING 54-0 STORAGE TANK WATER STORAGE YARD YARD SITE 0-0 64A MAIN TRANSFORMER 18-0 THERMAL AUTOMATIC DELUGE FULL AREA TRANSFORMER NO. YARD SUPPRESSION 31 HYDRANT HOSE STATION 65A MAIN TRANSFORMER 18-0 THERMAL AUTOMATIC DELUGE FULL AREA TRANSFORMER NO. YARD SUPPRESSION 32 HYDRANT HOSE STATION UNIT AUXILIARY TRANSFORMER 18-0 THERMAL AUTOMATIC DELUGE FULL AREA 66A TRANSFORMER YARD SUPPRESSION HYDRANT HOSE

STATION

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:07 07 AUG 1985 PAGE

Fire area Fire zone Description... Building... Elevation Detector Detector remarks Extinguishing.. Extinguishing.. System Remarks

2

				•			System	Remarks
	67A	STATION AUXILIARY TRANSFORMER	TRANSFORMER YARD	18-0	THERMAL		AUTOMATIC DELUGE	FULL AREA SUPPRESSION
			-				HYDRANT HOSE STATION	
	94A	MASTE HOLDUP TANK AREA	MASTE HOLDUP TANK PIT	<b>33-</b> 0				
	95A	NASTE HOLDUP TANK AREA	MASTE HOLDUP TANK PIT	33-0				
	96A	MASTE HOLDUP TANK PIT	WASTE HOLDUP TANK PIT	33-0				
	97A	Naste Holdup Tank Area	MASTE HOLDUP TANK PIT	33-0			CO2 MANUAL . EXTINGUISHER HOSE LINE	
•	<b>98</b> A	Maste Holdup Feed Pump Area	WASTE HOLDUP TANK PIT	33-0				
	105A	PRIMARY WATER STORAGE TANK	MASTE HOLDUP TANK PIT	<b>54-</b> 0				·
AFW-6	23	AUXILIARY BOILER FEED PUMP ROOM	AUX BOILER FEED WATER	18-6	ŚMOKE	FULL AREA DETECTION	CO2 MANUAL EXTINGUISHER HOSE LINE	FULL AREA SUPPRESSION
							SPRINKLER	
CNT-1	70A	RCP AREA	CONTAINMENT	<b>4</b> 6-0	SMOKE		CO2 MANUAL EXTINGUISHER HOSE LINE	
CNT-1	71A	RCP AREA	CONTAINMENT	<b>4</b> 6-0	SMOKE		CO2 MANUAL EXTINGUISHER HOSE LINE	
CNT-1	72A	DUTER ANNULUS	CONTAINMENT	<b>4</b> 6-0				
CNT-1	75A	OUTER ANNULUS	CONTAINMENT	<b>46-</b> 0	SHOKE	•	CO2 MANUAL EXTINGUISHER HOSE LINE	·
CNT-1	76A	OUTER ANNULUS	CONTAINMENT	46-0				
CNT-1	77A	DUTER ANNULUS	CONTAINMENT	46 <del>-</del> 0	SMOKE		CO2 MANUAL EXTINGUISHER HOSE LINE	

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:09 07 AUG 1985 PAGE

3

CO2 MANUAL

Fire area Fire zone Description.... Building.... Elevation Detector Detector remarks Extinguishing... Extinguishing... System CNT-1 78A RECIRCULATION CONTAINMENT 46-0 PUMPS AND RHR HEAT EXCHANGER CNT-1 808 CONTAINMENT FAN CONTAINMENT 68-0 CO2 MANUAL COOLER AREA EXTINGUISHER HOSE LINE SPRINKLER CNT-1 **B1A** CONTAINMENT FAN CONTAINMENT 68-0 CO2 MANUAL COOLER AREA EXTINGUISHER HOSE LINE SPRINKLER CNT-1 **82A** CONTAINMENT FAN CONTAINMENT 68-0 CO2 MANUAL COOLER AREA **EXTINGUISHER** HOSE LINE SPRINKLER CNT-1 **83A** CONTAINMENT FAN CONTAINMENT 68-0 CO2 MANUAL COOLER AREA EXTINGUISHER HOSE LINE SPRINKLER CNT-1 **84A** CONTAINMENT FAN CONTAINMENT 68-0 CO2 MANUAL COOLER AREA EXTINGUISHER HOSE LINE SPRINKLER CNT-1 INCORE DETECTOR CONTAINMENT 68-0 85A CO2 MANUAL DRIVE AREA EXTINGUISHER HOSE LINE CNT-1 DUTER ANNULUS CONTAINMENT 68-0 87A CO2 MANUAL EXTINGUISHER HOSE LINE CNT-1 86A REFUELING FLOOR CONTAINMENT 95-0 SMOKE CO2 MANUAL AREA EXTINGUISHER HOSE LINE CTL-3 14 SWITCHGEAR ROOM CONTROL 15-0 IONIZATI FULL AREA CD2 FULL AREA DETECTION AUTO-SUPPRESSION SUPPRESSION THERMAL CO2 MANUAL EXTINGUISHER HOSE LINE **33A** DELUGE VALVE CTL-3 CONTROL 15-0 ROOM

CTL-3

35A

**AIR** 

CONTROL

15-0

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:10 07 AUG 1985 PAGE

Fire area Fire zone Description.... Building.... Elevation Detector Detector remarks Extinguishing... Extinguishing... System Remarks CONDITIONING EXTINGUISHER ROOM HOSE LINE SPRINKLER CTL-3 34A FAN ROOM CONTROL 27-0 HOSE LINE CTL-3 CABLE SPREADING CONTROL 11 33-0 HEAT FULL AREA CO2 FULL AREA ROOM DETECTION AUTO-SUPPRESSION SUPPRESSION SMOKE CO2 MANUAL EXTINGUISHER HOSE LINE CTL-3 CO2 MANUAL 12 BATTERY ROOM 31 CONTROL 33-0 ULTRA-VI FULL AREA OLET DETECTION EXTINGUISHER CTL-3 BATTERY ROOM 32 CONTROL 33-0 ULTRA-VI FULL AREA CO2 MANUAL 13 EXTINGUISHER OLET DETECTION CTL-3 15 CONTROL ROOM **5**3-0 IONIZATI 150 LB WHEELED CONTROL ON HALON CO2 MANUAL EXTINGUISHER HOSE LINE CTL-3 10 DG NO. 31 ROOM DIESEL 15-0 HEAT FULL AREA **CO**2 FULL AREA DETECTION AUTO-SUPPRESSION SUPPRESSION ULTRA-VI HANDHELD OLET CHEMICAL HOSE LINE SPRINKLER DIESEL 15-0 CTL-3 101A DIESEL HEAT FULL AREA FULL AREA CO2 SENERATOR ROOM DETECTION AUTO-SUPPRESSION SUPPRESSION NO. 32 HANDHELD CHEMICAL HOSE LINE SPRINKLER CTL-3 DIESEL DIESEL 15-0 HEAT 102A FULL AREA **CO2** FULL AREA GENERATOR ROOM DETECTION AUTO-SUPPRESSION SUPPRESSION NO. 33 HANDHELD CHEMICAL HOSE LINE SPRINKLER

SUMP AND PUMP

ROOM

CTL-3

36A

DIESEL

15-0

HANDHELD CO2

# NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:11 07 AUG 1985 PAGE 5

Fire area	a fire zone	Description	Building	Elevation	Detector	Detector remarks	Extinguishing System	Extinguishing Remarks
ETN-4	7A	ELECTRICAL TUNNEL (LOWER)	TUNNEL	33-0	HEAT	FULL AREA DETECTION	AUTOMATIC CABLE TRAY SPRINKLERS	SUPPRESSION IS PROVIDED FOR CABLE TRAYS
					SMOKE		CO2 MANUAL EXTINGUISHER SPRINKLER	
ETN-4	7 <b>4</b> A	ELECTRICAL PENETRATION AREA (LOWER)	TUNNEL	34-0	ON	FULL AREA DETECTION		SUPPRESSION IS PROVIDED FOR CABLE TRAYS
	·				THERMAL		CO2 MANUAL EXTINGUISHER	
ETN-4	60A .	ELECTRICAL TUNNEL (UPPER)	TUNNEL	43-0	HEAT	FULL AREA DETECTION	AUTOMATIC CABLE TRAY SPRINKLERS	SUPPRESSION IS PROVIDED FOR CABLE TRAYS
·		•			SMOKE		CO2 MANUAL EXTINGUISHER SPRINKLER	
ETN-4	73A	ELECTRICAL PENETRATION AREA (UPPER)	TUNNEL	46-0	IONIZATI ON	FULL AREA DETECTION	AUTOMATIC CABLE TRAY SPRINKLERS	SUPPRESSION IS PROVIDED FOR CABLE TRAYS
					THERMAL		CO2 MANUAL EXTINGUISHER SPRINKLER	
PAB-2	10A	VALVE CORRIDOR	AUXILIARY	15-0			CO2 MANUAL EXTINGUISHER HOSE LINE	
PAB-2	11A	SUMP TANK AND PUMP ROOM	AUXILIARY	15-0				,
PAB-2	12A	CORRIDOR PAB ELEV. 15-0	AUXILIARY	15-0	SMOKE	PARTIAL AREA DETECTION	CO2 MANUAL EXTINGUISHER HOSE LINE	
PAB-2	13A	LARGE GAS DECAY TANK ROOM	AUXILIARY	15-0				
PAB-2	14A	CORRIDOR PAB ELEV 15-0	AUXILIARY	15-0	IONIZATI ON	FULL AREA DETECTION		
PAB-2	15A	SPENT RESIN STORAGE TANK ROOM	AUXILIARY	15-0			CO2 MANUAL EXTINGUISHER	
							HOSE LINE	
PAB-2	16A	CHEMICAL DRAIN TANK ROOM	AUXILIARY	15-0			CD2 MANUAL EXTINGUISHER	

#### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:12 07 AUG 1985 PAGE

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**EXTINGUISHER** 

Remarks

Fire area Fire zone Description... Building... Elevation Detector Detector remarks Extinguishing... Extinguishing... System HOSE LINE PAB-2 3 RHR PUMP ROOM **AUXILIARY** 15-0 SMOKE FULL AREA CO2 MANUAL 31 DETECTION **EXTINGUISHER** HOSE LINE PAB-2 RHR PUMP ROOM **AUXILIARY** 15-0 SMOKE FULL AREA CO2 MANUAL 32 DETECTION **EXTINGUISHER** HOSE LINE **AUXILIARY** PAB-2 69A PIPING AND 15-0 SMOKE FULL AREA VALVE ROOM DETECTION PAB-2 84 EMPTY ROOM **AUXILIARY** 15-0 CO2 MANUAL EXTINGUISHER HOSE LINE 9A SMOKE PAB-2 RHR FUTURE PUMP AUXILIARY 15-0 FULL AREA CO2 MANUAL ROOM DETECTION **EXTINGUISHER** HOSE LINE PAB-2 5A PIPING TUNNEL **AUXILIARY** 32-6 PAB-2 4A CORRIDOR **AUXILIARY** 34-0 CO2 MANUAL EXTINGUISHER HOSE LINE PAB-2 **68A** ION EXCHANGE **AUXILIARY** 34-0 **COLUMN ROOM** PAB-2 VALVE ROOM **AUXILIARY** 68 34-0 PAB-2 9 SAFETY **AUXILIARY** 34-0 CO2 MANUAL INJECTION PUMP **EXTINGUISHER** ROOM HOSE LINE PAB-2 2 CONTAINMENT **AUXILIARY** 34-0,41-0 SMDKE FULL AREA CD2 MANUAL SPRAY PUMP ROOM DETECTION **EXTINGUISHER** HOSE LINE PAB-2 34 PIPING TUNNEL **AUXILIARY** 34-0,41-0 SMOKE CO2 MANUAL EXTINGUISHER HOSE LINE PAB-2 **CCN PUMP ROOM AUXILIARY** 41-0 SMOKE FULL AREA CO2 MANUAL DETECTION EXTINGUISHER HOSE LINE PAB-2 1A FLASH **AUXILIARY** 41-0 CO2 MANUAL

EVAPORATOR ROOM

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:13 07 AUG 1985 PAGE

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Fire area Fire zone Description... Building... Elevation Detector Detector remarks Extinguishing... Extinguishing... System: HOSE LINE PAB-2 2A PRIMARY MAKEUP AUXILIARY 41-0 SMOKE PARTIAL AREA CO2 MANUAL WATER PUMP ROOM **EXTINGUISHER** DETECTION HOSE LINE PAB-2 58A PIPING TUNNEL HOSE LINE AUXILIARY 41-0 SMOKE PARTIAL AREA DETECTION PAB-2 17A CORRIDOR 55-0 SMOKE **AUXILIARY** PARTIAL AREA CO2 MANUAL DETECTION **EXTINGUISHER** (DETECTION IS NOT PROVIDED IN AREA OF AIR RECEIVERS ONLY) HOSE LINE PAB-2 18A WASTE GAS **AUXILIARY** 55-0 HOSE LINE COMPRESSOR ROOM PAB-2 19A WASTE **AUXILIARY** 55-0 CO2 MANUAL **EVAPORATOR ROOM EXTINGUISHER** HOSE LINE PAB-2 20A SAMPLING ROOM **AUXILIARY** 55-0 PAB-2 21A WASTE STORAGE 55~0 **AUXILIARY** IONIZATI FULL AREA AND DRUMMING ON DETECTION AREA PAB-2 5 CHARGING PUMP **AUXILIARY** 55-0 SMOKE FULL AREA CO2 MANUAL **ROOM 31** DETECTION EXTINGUISHER HOSE LINE PAB-2 CHARGING PUMP 55-0 SMOKE CO2 MANUAL **AUXILIARY** FULL AREA **ROOM 32** DETECTION **EXTINGUISHER** HOSE LINE PAB-2 63A MASTE **AUXILIARY** 55-0 CONDENSATE TANK ROOM PAB-2 7 CHARGING PUMP **AUXILIARY** 55-0 SMOKE FULL AREA CO2 MANUAL **ROOM 33** DETECTION EXTINGUISHER HOSE LINE BORIC ACID TANK AUXILIARY 55-0 SMOKE PAB-2 8 FULL AREA CO2 MANUAL AREA DETECTION EXTINGUISHER HOSE LINE PAB-2 22A BORIC ACID **AUXILIARY** 73-0

## NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:14 07 AUG 1985 PAGE

Fire area Fire zone Description... Building... Elevation Detector Detector remarks Extinguishing.. Extinguishing.. System Remarks

		EVAPORATOR ROOM 32		
PAB-2	23A	ENTRY FOR ZONES AUXILIARY 22A AND 24A	73-0	
PAB-2	248	BORIC ACID AUXILIARY EVAPORATOR ROOM 31	73-0	
PAB-2	25A	SEAL MATER HEAT AUXILIARY EXCHANGER ROOM	73-0	
PAB-2	26A	REACTOR COOLANT AUXILIARY FILTER	73-0	
PAB-2	27A	CORRIDOR PAB AUXILIARY ELEV. 73-0	73-0	CO2 MANUAL EXTINGUISHER HOSE LINE
PAB-2	<b>28</b> A .	VALVE CORRIDOR AUXILIARY	73-0	
PAB-2	29A	VOLUME CONTROL AUXILIARY TANK ROOM	73-0	
PAB-2	30A	VALVE CORRIDOR AUXILIARY	73-0	CO2 MANUAL EXTINGUISHER HOSE LINE
PAB-2	31A	CONCENTRATE AUXILIARY HOLDING TANK ROOM	73-0	CO2 MANUAL EXTINGUISHER
PAB-2	<b>32</b> A	NON-REGENERATIV AUXILIARY E HEAT EXCHANGER ROOM	73-0	HOSE LINE  CO2 MANUAL  EXTINGUISHER  HOSE LINE
PAB-2	<b>8</b> 9A	STORAGE AREA AUXILIARY	73-0	
PAB-2	. 61A	PIPING TRENCH FAN HOUSE	32-6	
PAB-2	622	BORON INJECTION FAN HOUSE .	32-6	
PAB-2	79A	STEAM GENERATOR FAN HOUSE BLOWDOWN TANK	32-6	
PAB-2	<b>62</b> A	PIPING TRENCH FAN HOUSE	35-0	

# NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:15 07 AUG 1985 PAGE

Fire area	Fire zone	Bescription	Building	Elevation	Detector	Detector remarks	Extinguishing System	Extinguishing Remarks
PAB-2	59A	PIPING PENETRATION AREA	FAN HOUSE	41-0	SMOKE	FULL AREA DETECTION	CO2 MANUAL EXTINGUISHER HOSE LINE	
PAB-2	<b>88</b> A	PAB FSB AND CONTAINMENT VENTILATION SYSTEMS AREA	FAN HOUSE	72-0			THE LINE	
TBL-5	52A	CHEMICAL ADDITION AREA	AUX BOILER FEED WATER	32-6			CO2 MANUAL EXTINGUISHER HOSE LINE	
TBL-5	57A	MAIN STEAM AND FEEDMATER VALVE AREA		43-0			CO2 MANUAL EXTINGUISHER	
							HOSE LINE	
TBL-5	54A	MAIN BOILER FEEDMATER REGULATOR AREA	M.S. & B.F. PIPE ENC.	11-6			HOSE LINE	
TBL-5	53A	FEEDMATER BYPASS REGULATOR PLATFORM	M.S. & B.F. PIPE ENC.	32-6			HOSE LINE	
TBL-5	119	SERVICE WATER VALVE PIT	TURBINE	15-0				
TBL-5	16	TURBINE DIL RESERVOIR AREA	TURBINE	15-0	HEAT	FULL AREA DETECTION	AUTO-FOAM DELUGE HOSE LINE	FULL AREA SUPPRESSION
TBL-5	17	TURBINE OIL RESERVOIR AREA	TURBINE	15-0	HEAT	FULL AREA DETECTION	AUTO-FOAM DELUGE	FULL AREA SUPPRESSION
							EXTINGUISHER HOSE LINE	·
TBL-5	18	TURBINE LUBE OIL COND. AREA	TURBINE	15-0	HEAT	FULL AREA DETECTION	AUTO-FOAM DELUGE	FULL AREA SUPPRESSION
							CO2 MANUAL EXTINGUISHER HOSE LINE	
TBL-5	19	STATION AIR COMPRESSOR AREA	TURBINE	15-0			MANUAL-FOAM SPRINKLERS	FULL AREA SUPPRESSION
TBL-5	20	BOILER FEED	TURBINE	15-0	THERMAL	FULL AREA	AUTD-FOAM DELUGE	FULL AREA

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:17 07 AUG 1985 PAGE 10

Fire area Fire zone Description.... Building.... Elevation Detector Detector remarks Extinguishing... Extinguishing... System Remarks PUMP LUBE DIL DETECTION **SUPPRESSION** RESERVOIR CO2 MANUAL **EXTINGUISHER** HOSE LINE TBL-5 21 HYDROGEN SEAL TURBINE 15-0 THERMAL FULL AREA AUTO-FOAM DELUGE FULL AREA OIL RESERVOIR DETECTION SUPPRESSION CO2 MANUAL **EXTINGUISHER** HOSE LINE SPRINKLER **SROUND FLOOR** TURBINE TBL-5 **37A** 15-0 CO2 MANUAL FULL AREA EXTINGUISHER **SUPPRESSION** HOSE LINE SPRINKLER TBL-5 **38A** GROUND FLOOR TURBINE 15-0 CO2 MANUAL PARTIAL AREA EXTINGUISHER SUPPRESION HOSE LINE **SPRINKLER** TBL-5 39A **GROUND FLOOR** TURBINE 15-0 CO2 MANUAL FULL AREA EXTINGUISHER SUPPPRESSION HOSE LINE SPRINKLER TURBINE TBL-5 40A **GROUND FLOOR** 15-0 CO2 MANUAL FULL AREA SUPPRESSION EXTINGUISHER HOSE LINE SPRINKLER TBL-5 41A GROUND FLOOR TURBINE 15-0 CO2 MANUAL FULL AREA EXTINGUISHER SUPPRESSION HOSE LINE SPRINKLER

TBL-5

TBL-5

TBL-5

42A

43A

**GROUND FLOOR** 

MEZZANINE FLOOR TURBINE

MEZZANINE FLOOR TURBINE

TURBINE

15-0

36-9

36-9

CD2 MANUAL

CO2 MANUAL

CO2 MANUAL EXTINGUISHER HOSE LINE

EXTINGUISHER HOSE LINE SPRINKLER

EXTINGUISHER HOSE LINE SPRINKLER FULL AREA SUPPRESSION

FULL AREA SUPPRESSION

### NEW YORK POWER AUTHORITY - INDIAN POINT NUCLEAR POWER PLANT UNIT 3 TABLE 2-4 FIRE AREA/ZONE CHARACTERISTICS 14:58:18 07 AUG 1985 PAGE 11

Fire area Fire zone Description.... Building.... Elevation Detector Detector remarks Extinguishing... Extinguishing... System Remarks TBL-5 45A MEZZANINE FLOOR TURBINE 36-9 TBL-5 46A MEZZANINE FLOOR TURBINE CO2 MANUAL 36-9 FULL AREA EXTINGUISHER SUPPRESSION HOSE LINE SPRINKLER TBL-5 47A MEZZANINE FLOOR TURBINE 36-9 CO2 MANUAL FULL AREA EXTINGUISHER SUPPRESSION HOSE LINE SPRINKLER TBL-5 **48**A LOADING WELL TURBINE 36-9 TBL-5 49A TURBINE FLOOR TURBINE 53-0 TBL-5 50A TURBINE FLOOR TURBINE 53-0 TBL-5 51A TURBINE FLOOR TURBINE 53-0

## 5. PROPOSED FIRE PROTECTION AND SAFE SHUTDOWN SYSTEMS MODIFICATIONS

#### 5.1 Introduction

Certain fire protection and safe shutdown systems modifications have been identified as a result of this 10 CFR 50 Appendix R reanalysis utilizing a revised safe shutdown model and updated fire hazards analysis. These fire protection and plant equipment modifications provide enhancements to structures, systems and components important to safe shutdown in order to fully comply with the objective of Appendix R, ensuring that one train necessary to achieve and maintain hot shutdown remains free of fire damage.

This section describes the plant modifications proposed for IP3 to achieve compliance with the requirements of Appendix R Sections III.G.2 and III.G.3. In general, the proposed modifications could be divided into two categories, fire protection and alternative safe shutdown modifications. The fire protection modifications will be implemented to meet the criteria set forth in Section III.G.2 of Appendix R. The alternative safe shutdown modifications involve the enhancement of the existing alternative shutdown capability to achieve verbatim compliance with the requirements of Appendix R Section III.G.3.

This report section identifies, by fire area, the respective fire protection and safe shutdown systems modifications that are proposed at IP3. Sections 3 and 6 review these modifications in support of the safe shutdown system scenario and fire hazards analysis, respectively.

#### 5.2 <u>Containment Building - Fire Area CNT-1</u>

The Appendix R fire hazards analysis performed for the Containment Building, Fire Area CNT-1, identified several deviation points. This fire area will comply with Section III.G.2(f) of Appendix R at the completion of the installation of noncombustible radiant energy shields between redundant systems. A description of the required modifications is contained in the following subsection.

#### 5.2.1 Fire Protection Modifications

Noncombustible fire barriers that act as radiant energy shields will be provided for the following instrument channels:

- (1) From wide range RCS pressure transmitter PT-402 to electrical penetration H23
- (2) For the instrument cables for wide range RCS temperature elements TE413A and TE413B at the penetration area
- (3) For wide range SG level transmitter LT-417D and associated instrument cable at instrument rack 21, and for the instrument cable at the electrical penetration area
- (4) For transmitter LT-459 and associated instrument cable at instrument rack 19, and for the instrument cable at the electrical penetration area
- (5) To protect source range N31 instrument cable from the related preamp box to penetration H20

With the installation of the above noncombustible fire barriers, suitable protection of instrumentation required for safe shutdown of the plant will be achieved.

# 5.3 Primary Auxiliary Building - Fire Area PAB-2

The Appendix R fire hazards analysis performed for the Primary Auxiliary Building, Fire Area PAB-2, has identified deviation points that require modifications to compensate for the requirements of Section III.G.2(b). These modifications are addressed by the elevations in this fire area where safe shutdown equipment is located. These modifications are reviewed in the Section 6 exemption request and are described below.

### 5.3.1 Fire Protection Modifications

#### 15 ft Elevation

- (1) Automatic detection will be extended into Fire Zone 69A, which is located between the RHR pumps, and into the common corridor and fixed storage area in Fire Zone 14A.
- (2) The partial wall barriers between the RHR pumps will be sealed to provide at least a one-hour fire rating to prevent direct fire propagation between pumps. This will provide an additional basis for the exemption requested in paragraph 6.4.1(1) of this report.
- (3) Any open electrical conduits leading into the Electrical Cable Tunnels (Fire Area ETN-4) will be sealed to the appropriate rating of the barrier that they penetrate, as delineated in Table 2-2.

#### 41 ft Elevation

(1) Automatic detection will be extended to cover the fixed storage area and common corridor in Fire Zone 58A. One additional detector will be added to the west of CCW pump 33.

- (2) A partial height noncombustible barrier will be constructed to protect CCW pump 33 against radiant fire energy and postulated fires. This will provide an additional basis for the exemption requested in paragraph 6.4.1(2) of this report.
- (3) A full barrier in the form of a noncombustible wrap will be provided for the normal power feed to CCW pump 33 from the ceiling level to the height of the partial barrier. This will provide an additional basis for the exemption requested in paragraph 6.4.1(4) of this report.
- (4) Any open electrical conduits leading into the Electrical Cable Tunnels (Fire Area ETN-4) will be sealed to the appropriate rating of the barrier that they penetrate, as delineated in Table 2-2.

#### 55 ft Elevation

Automatic detection will be extended to cover the adjacent Fire Zone 17A outside the cubicles for charging pumps 31, 32 and 33. Automatic detection will also be added to Fire Zone 21A, the Drum Storage Area. This will provide an additional basis for the exemption requested in paragraph 6.4.1(3) of this report.

### 5.3.2 Safe Shutdown Systems Modifications

The proposed IP3 safe shutdown systems modifications in Fire Area PAB-2 consist of installing Reactor Coolant System pressure and source range indication at Control Station PL6 on the 55-ft elevation of the Primary Auxiliary Building. The proposed modifications will provide the capability for isolation of PT-402 at the electrical penetration area. Readout capability of PT-402 will also be provided at Control Panel PT2 located in the ABFW Pump Room.

# 5.4 Electrical Cable Tunnels - Fire Area ETN-4

The Appendix R fire hazards analysis performed for the Electrical Cable Tunnels, Fire Area ETN-4, identified one deviation point that requires a modification in order to comply with the exemption application configuration detailed in Section 6 of this submittal. The modification will allow compliance with Section III.G.2(c) for the specified configuration. There are also deviations on the boundary fire barriers that are addressed in the following modifications:

### 5.4.1 Fire Protection Modifications

- (1) A one-hour-rated fire barrier will be provided for one channel of safe shutdown instrumentation at the Upper Penetration Area from the Containment wall to the entrance of the Lower Tunnel.
- (2) The boundary fire barriers between Fire Area ETN-4 and Fire Area PAB-2 have unsealed conduit that will be sealed with a fire retardant material that is equivalent to the required rating of the fire barrier, as delineated in Table 2-2.
- (3) Doors 210 and 211, located between the Electrical Cable Tunnels and PAB, will be replaced by three-hour-rated doors.
- (4) The door between the Electrical Cable Tunnels and the Cable Spreading Room will be modified, as necessary, to close upon the initiation of a fire in the Cable Tunnels.

### 5.4.2 Safe Shutdown Systems Modifications

The proposed IP3 safe shutdown systems modifications in Fire Area ETN-4 consist of the installation of switching capability for wide range Reactor Coolant System instruments TE-413A, TE-413B and PT-402, to provide indication at local control

stations. This will provide alternative indication of hot and cold leg temperatures for loop 31 at Control Panel PT2, located in the ABFW Pump Room, along with RCS pressure indication both at PT2 and Control Station PL6, located in the PAB.

Furthermore, the necessary wiring modifications to the KH4 cabinet will be implemented to remove the alternative capability for reading LT-447D indication from the local control station. Steam generator level instrument channel LT-417D will be installed into the KH4 cabinet panel to provide the appropriate alternate steam generator level indications for a postulated fire in the Control Building or Cable Tunnel entrance. Level instrument cables LT-447D and LT-462 will be rerouted into JD tray at the penetration area so that protection of this Channel IV tray would ensure the availability of the corresponding readings in the Control Room for the postulated fire in the Upper Penetration Area. Level transmitters LT-447D and LT-462 provide indications of steam generator 34 and pressurizer levels, respectively, at local stations.

#### 5.5 <u>Auxiliary Boiler Feedwater Pump Room - Fire Area AFW-6</u>

The Appendix R fire hazards analysis performed for the Auxiliary Boiler Feedwater Pump Room, Fire Area AFW-6, identified deviations that require modifications to address the requirements of Section III.G.2(b), specifically, automatic suppression. These are detailed in an exemption request for intervening combustibles in Section 6 of this report.

#### 5.5.1 Fire Protection Modifications

An automatic suppression system in the form of an automatic sprinkler system will be installed throughout Fire Area AFW-6. This system will be installed in accordance with NFPA-13 guidelines and design criteria to protect against the existing hazards (intervening combustibles) that are present in the area or that may be introduced into the area. This will provide an additional basis for the exemption requested in paragraph 6.3.1 of this report.

#### 5.5.2 Safe Shutdown Systems Modifications

(1) Redundant Local Steam Generator Gauges at the Steam Generator ASD Stations

New SG wide range (mechanical) pressure gauges will be installed at elevation 43 ft in Fire Zone 57A of the Auxiliary Boiler Feedwater Building near the existing local SG atmospheric steam dump (ASD) control stations. These gauges will be used to monitor secondary steam pressure.

(2) Independent Backup Nitrogen Supply to Steam Generator ASDs

The existing nitrogen backup capability common to the AFW air-operated valves, AFW turbine-driven pump speed control, and SG ASDs will be modified such that nitrogen bottles and respective piping will be installed independent from this fire area near the respective SG ASD control stations.

(3) Hot and Cold Leg Temperatures

Indication of the establishment of natural circulation in loop 31 at PT2 will be provided. The hot leg temperature reading in conjunction with the RCS pressure determines the necessary subcooling margin.

(4) Reactor Coolant System Pressure

Isolation capability will be provided at the electrical penetration area to allow readout of pressure transmitter PT-402 in the ABFW Pump Room (on Control Panel PT2) and at Control Station PL6 located at the 55 ft elevation of the PAB.

# 5.6 <u>Control Building - Fire Area CTL-3; Primary Auxiliary</u> <u>Building - Fire Zone 17A; Electrical Cable Tunnels - Fire Zones 7A/60A</u>

NYPA will expand its existing alternative shutdown capability that meets Section III.G.3 to concur with the performance goals of Section III.L of Appendix R to 10 CFR 50. This subsection describes the proposed alternative shutdown modifications to achieve compliance in the fire area and fire zones of concern. The IP3 alternative shutdown capability necessary to achieve compliance with performance goals of Section III.L is described in Section 3 of this report.

#### 5.6.1 Safe Shutdown Modifications

The safe shutdown systems modifications proposed for alternative shutdown in this submittal are directed to enhance the on-site emergency power distribution system and safe shutdown monitoring capability for a fire disabling normal indications in the Control Room.

#### On-Site Alternative Power System

The existing normal AC Emergency Power System at IP3 consists of three diesel generators, four buses housed within two switchgears, associated motor control centers, power and control cables, and respective distribution panels. For an unmitigated fire in the Switchgear Room where the redundant switchgears are located, availability of the normal emergency on-site power in the absence of off-site power is jeopardized. Therefore, IP3 has proposed to install a new emergency diesel generator to supply

power through the existing alternative power cables to selected safe shutdown components. The new diesel generator will be totally self-contained and will not require the availability of existing safe shutdown support systems such as service water jacket cooling and fuel oil transfer. The new diesel generator will feed the 480V bus 312 through the 6.9kV On-Site Power Distribution System.

Alternative power is then transferred through the 480V MCC-312A to the following safe shutdown components:

- (1) Service water pump 38
- (2) Component cooling water pump 32
- (3) Charging pump 31 or 32
- (4) Alternative shutdown instrumentation

The alternative power cables provide motive power to the above safe shutdown components, independent from the existing normal Emergency Power System. Alternative power for safe shutdown instrumentation is supplied from MCC-312A to an existing isolation switch located in the penetration area of the Upper Cable Tunnel, through a stepdown transformer and a voltage regulator located in the Turbine Building. The configuration will be used for the new alternative shutdown channels (cold and hot leg temperatures, RCS pressure and neutron flux monitor) by installing a new instrument isolation cabinet at the electrical penetration area.

The proposed alternative Emergency Power System will ensure the availability of safe shutdown power for an unmitigated fire disabling the normal Emergency Power Distribution System.

The proposed alternative Emergency Power Distribution System modification will be used in the case of a fire in any one of the following fire areas or fire zones:

- (1) Control Building Fire Area CTL-3
- (2) Primary Auxiliary Building Fire Area PAB-2 (Fire Zone 17A) at the motor control centers
- (3) Electrical Cable Tunnels Fire Area ETN-4 (Fire Zones 60A/7A) entranceway

These are reviewed in Section 6 of this report, which identifies exemption requests for specific configurations and takes credit for the presence of the proposed alternative Emergency Power System.

#### Alternative Shutdown Instrumentation

The existing instrumentation system at IP3 provides indication of the essential primary and secondary parameters in the Control Room. The existing alternative shutdown instrumentation at IP3 consists of remote indication of the required plant parameters at local control stations located in the ABFW Pump Room and the PAB.

As described previously, the proposed modification to the existing alternative power system would ensure the availability of alternative power for alternative shutdown instrumentation. This will be accomplished by supplying alternative power to the

instrument isolation cabinets, located in the penetration area of the Upper Electrical Cable Tunnel, through a stepdown transformer and voltage regulator located in the Turbine Building.

Ιn order to achieve with compliance the minimum instrumentation required for safe shutdown, NYPA proposes to upgrade the existing capability of remote indication of essential plant parameters. Installation of the following new instrumentation indications is proposed:

- (1) RCS pressure providing indication of the primary pressure in the PAB (Control Station PL6) and ABFW Pump Room (Control Panel PT2).
- (2) Source range monitor providing reactivity indication in the PAB (Control Station PL6).
- (3) Hot and cold leg temperatures providing indication of the establishment of natural circulation in loop 31 at PT2. The hot leg temperature reading in conjunction with the RCS pressure determines the subcooling margin.

The above proposed modifications in conjunction with the existing capability at IP3 ensure the achievement of safe shutdown for a fire in any one of the fire zones of the Control Building or the entrance to the Cable Tunnels.

#### Local Control of MDAFW Pump 33

The proposed modification will provide local isolation and control of switchgear breaker 52/AF3 at bus 6A to facilitate remote operation of MDAFW pump 33. This method of control from the Switchgear Room will be used in the absence of Control Room control.

#### ATTACHMENT 2 IPN-85-47

# PROPOSED EXEMPTIONS FROM SECTION III.G.2 OF APPENDIX R TO 10 CFR 50

- A. CABLE TUNNELS FIRE AREA ETN-4
- B. YARD AREA

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLAN
DOCKET NO. 50-286

#### A. Electrical Tunnels: Fire Area ETN-4 Exemption Request

Pursuant to 10 CFR 50.12, an exemption is requested from the requirements of Section III.G.2.a of Appendix R to 10 CFR 50 for the floor/ceiling assembly separating the upper and lower electrical penetration areas, where a stairway penetrates the credited fire barrier, in Fire Area ETN-4.

Fire Area ETN-4 consists of two electrical tunnels separated by an 18 inch thick concrete barrier that is a controlled barrier. In general, redundant cables are in separate tunnels. The electrical tunnels contain power, control and instrumentation cables for Appendix R safe shutdown equipment located in the Primary Auxiliary Building and Auxiliary Boiler Building. The upper tunnel contains power cables for two of three component cooling water pumps, one residual heat removal pump, two of three charging pumps, one motor-driven auxiliary feedwater pump, and control cables for atmospheric relief valves. The lower tunnel contains power cables for one component cooling water pump, two residual heat removal pumps, one auxiliary feedwater pump, one of three charging pumps, and control cables for atmospheric relief valves.

Compliance with Appendix R is achieved through a combination of design features and exemption requests.

The fire area barriers are constructed of reinforced concrete and are exterior fire barriers or adjacent fire area barriers. The adjacent fire area barriers between the Containment Building (Fire Area CNT-1), Primary Auxiliary Building (Fire Area PAB-2), Control Building (Fire Area CTL-3), and Turbine Building (TBL-5) are protected fire barriers. The barrier between the two tunnels is a controlled barrier and the exterior walls are fire area barriers. All barriers are rated as delineated on Table 2-2 of the Reference (1) report.

Full area detection consisting of smoke and heat detectors and a closed head, pre-action sprinkler system exists in the electrical tunnels and penetration areas. While the suppression system was designed for cable tray protection, the system effectively provides full hazard coverage due to the size of the area, orientation of the sprinklers and spray pattern of the sprinkler heads.

Generally, redundant safe shutdown cabling (instrumentation, power and control) is located in separate tunnels and compliance with Section III.G.2.a of Appendix R is achieved within ETN-4. The adequacy of this barrier is discussed in the BTP 9.5-1, Appendix A NRC Safety Evaluation Report dated March 6, 1979. At the entrance to Fire Area ETN-4 from the Control Building (Fire Area CTL-3), the floor/ceiling assembly separating the tunnels is penetrated by a stairway. See Figure 1A.

Regarding the redundant safe shutdown related power and control cabling located at the entrance to the tunnels, the Staff has granted an exemption from the requirements of Section III.G.2.b of Appendix R for 20 feet of separation with no interviewing combustibles. Reference (7) provides the Staff's Safety Evaluation of this configuration. The exemption included acceptance of the cables installed in the cable tunnels such that they would not need to be considered as an intervening combustible.

Compliance with Section III.G.2.c of Appendix R is achieved in this area for one train of safe shutdown instrumentation. The instrumentation is protected in a one hour barrier to a point 20 feet beyond the point where the floor/ceiling assembly separates redundant channels. The one hour barrier in conjunction with the detection and suppression systems and the cable combustibility characteristics recognized in the Reference (7) exemption ensure the availability of one train of safe shutdown instrumentation for a fire which is postulated at the entrance to the Cable Tunnels. In addition, an alternate capability exists approximately eighty feet away from the postulated fire location. The distance to the alternate capability further ensures the availability of the necessary complement of instrumentation to achieve safe shutdown.

The Cable Tunnels terminate at the Containment Building, some 165 feet from the Control Building, at the electrical penetration areas. The upper and lower penetration areas are separated by a floor/ceiling assembly which complies with Section III.G.2.a of Appendix R with the exception of a second stairway which penetrates the barrier at the penetration area. See Figure 1B.

Redundant safe shutdown instrumentation cabling exits the Containment in the upper penetration area. One train is protected in the upper penetration area by a one-hour barrier until it enters the lower electrical tunnel through the floor/ceiling assembly. such, for a fire in the upper electrical penetration area, compliance with Appendix R, Section III.G.2.c is achieved. requested exemption outlined above pertains to the scenario where a fire is postulated in the lower penetration area, disabling one train of safe shutdown instrumentation and credit is taken for the floor/ceiling assembly to protect the redundant instrumentation in the upper penetration area. The existence of the stairway penetrating the floor/ceiling, however, necessitates an exemption from the literal interpretation of the rule requirements. exemption is justified based on existing plant design features which provide equivalent protection to that which would be afforded by literal compliance with Appendix R in this area.

As discussed above, a stairway penetrates the floor/ceiling assembly in the electrical penetration area of the electrical tunnels. See Figure 1B. The floor/ceiling assembly provides protection for the safe shutdown instrumentation routed in the upper electrical penetration area and tunnel from the effects of a fire in the lower electrical penetration area. Additional protection from the effects of a fire in the lower penetration area is provided by a 1/8 inch thick plate steel wall which surrounds the stairway opening in the upper electrical penetration area. This wall is unrated, however, credit for protection from the products of combustion

generated in a fire on the lower elevation is reasonable. The metal wall extends from the floor to just below the ceiling of the upper electrical penetration area. Openings at the ceiling are provided for conduits which traverse the space. No intervening combustibles are present which would provide a pathway for fire propagation from inside the metal enclosure into the upper electrical penetration area.

Sprinklers (6 heads) are located in the area under the stairs in the lower penetration area which would provide a level of protection from smoke and hot gases traveling up the stair enclosure.

The upper penetration area is a large volume area with a seventeen (17) foot ceiling and floor area of 1350 square feet. The large volume would effectively dilute any products of combustion which enter the area via the partially enclosed stairway.

The fire hazard in the lower electrical penetration area is small (39 minute fire duration) and a fire would be rapidly detected by the installed smoke detection system. The automatic sprinkler system would effectively suppress any fire of the size needed to produce combustion products capable of affecting the upper penetration area.

An automatic cable tray suppression and full area detection system is installed in both the lower and the upper penetration area of the electrical tunnels. The upper penetration area system is available to react in the event a lower penetration fire occurs which could impact the upper elevation. The installed sprinkler system is designed such that sprinkler heads are located approximately every ten feet along the cable trays in which the safe shutdown instrumentation cable is routed. The system was designed in accordance with NFPA-15 to provide full coverage of the tray area. The sprinkler system is a dry pipe pre-action design. The deluge valve is opened by the installed heat detection system which actuates at a temperature of 165°F. The individual sprinkler heads activate at 175°F.

The cable installed at IP-3 has superior fire resistance characteristics as described in Reference (1), Section 2. Damage to the cables is not expected to occur at temperatures which will activate the fire suppression system in the cable tunnels.

In addition, provisions for emergency smoke ejectors are installed in the roof hatchway which provide for 45000 cfm of ventilation in the upper penetration area to further mitigate the effects of any products of combustion in this area.

Based on the design features discussed above, the Authority concludes that an exemption from Section III.G.2.a of Appendix R for the stairway penetrating the floor of the upper penetration area will provide equivalent protection to that afforded by literal compliance with the rule.

#### B. Yard Area - Service Water Pumps Exemption Request

Pursuant to 10 CFR 50.12, an exemption is requested for the yard area from the requirements of Section III.G.2.b of Appendix R to 10 CFR 50 specifying detection and automatic suppression be installed in a fire area containing redundant safe shutdown equipment.

The Yard Area at Indian Point 3 contains the normal Service Water Pumps (SWP's) as well as the redundant, Backup Service Water Pumps (BSWP's). The relative location of each group of pumps is illustrated in the attached Figure 2. The SWP's are designated as safe shutdown equipment in Reference (1) since they provide cooling to the emergency diesel generators and Component Cooling Water (CCW) System. The immediate operation of the service water system is not required for the shutdown of the plant since the alternate diesel generator can be utilized in lieu of the emergency diesels. The alternate diesel does not require Service Water cooling. The thermal capacity of the CCW system provides an adequate heat sink for the heat loads which it services for safe shutdown. A complete description of the Service Water System is provided in Reference (1).

The normal SWP's are separated from the BSWP's by a distance in excess of 100 feet. There are negligible fixed intervening combustibles between the two groups of pumps. Since the pumps are located in the yard area, the large open area would disperse radiant energy and combustion products from any fire postulated in either pump area. Four fire hydrants and three hose houses are located in the vicinity of the pumps to facilitate manual fire suppression activities. (See Figure 2 for approximate locations).

Periodic surveillance of the yard area is performed by the security force which will provide appropriate fire detection awareness.

Based on the physical configuration of the redundant SWP groups, the lack of any appreciable quantities of combustibles between the pumps, the manual detection and suppression capability in the area, and the large distance between pump groups, compliance with the requirements of Section III.G.2.b of Appendix R for detection and automatic suppression systems would not appreciably enhance the existing fire protection in the yard area in the vicinity of the SWP's.

# UPPER ELECTRICAL TUNNEL Elev. 43'-0" Fire Area ETN-4

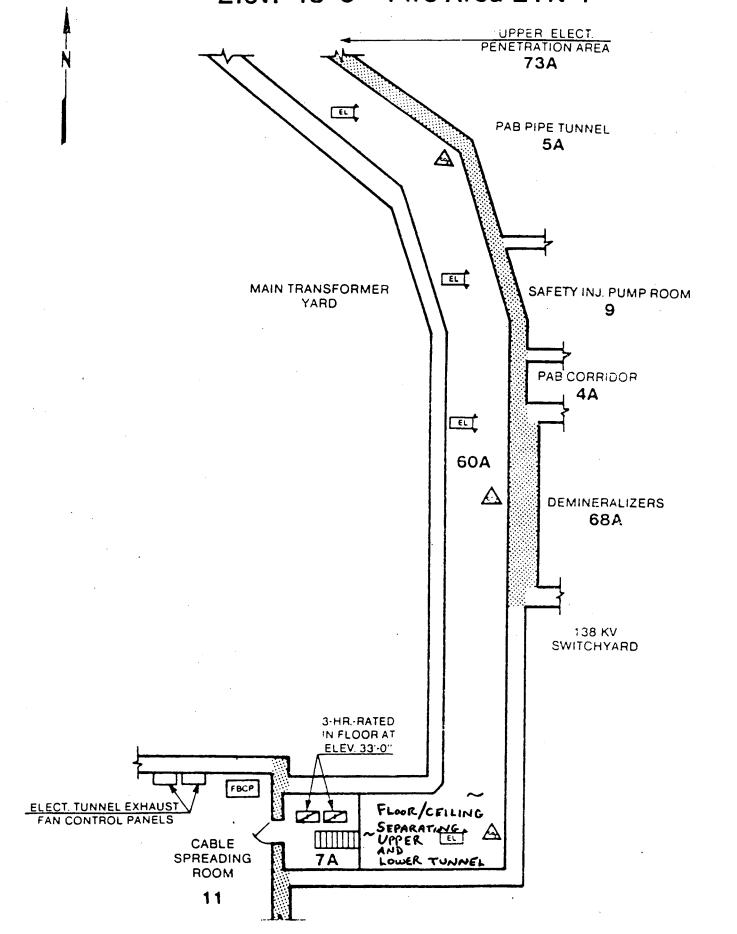
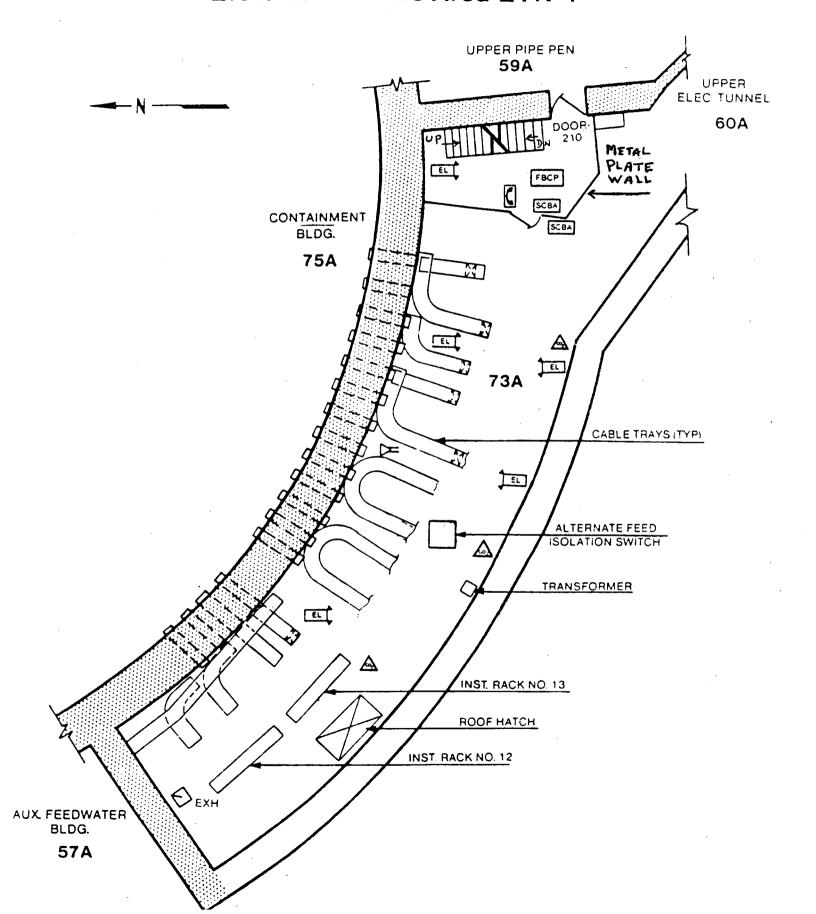
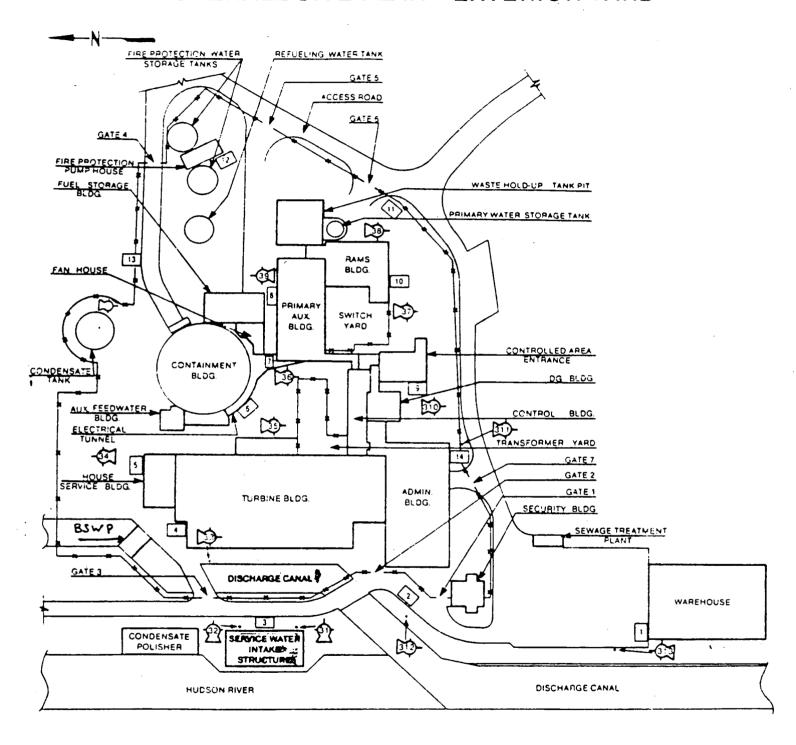


FIGURE 1B

# UPPER ELECTRICAL PENETRATION AREA Elev. 46'-0" Fire Area ETN-4



### **OVERALL SITE PLAN - EXTERIOR YARD**



#### LEGEND



#### ATTACHMENT 3 IPN-85-47

ADDITIONAL INFORMATION SUPPORTING
EXEMPTION FROM SECTION III.G.2
OF APPENDIX R TO 10 CFR 50
FOR CHARGING PUMPS AND DISCUSSION
OF SAFE SHUTDOWN EQUIPMENT SEPARATION
ON THE 34' AND 55' ELEVATIONS OF THE PAB

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

#### Clarification of Exemption Request Primary Auxiliary Building, 55' Elevation Charging Pumps

The Authority, in Reference (1), requested an exemption from the requirement in Section III.G.2 for full area automatic suppression on the 55' elevation of the Primary Auxiliary Building (PAB) in the vicinity of the charging pumps.

The three redundant charging pumps are located in separate cubicles with walls constructed of 2 feet of reinforced concrete. See the attached figure for a layout of the three pumps. The walls separating the pump cubicles provide an effective fire barrier for the negligible fire loading which exists in each cubicle (there is no fixed, exposed combustible loading in each of the pump cubicles). The expected transient fire loading in each cubicle is 25000 BTU/ft. 2 with an equivalent fire severity of 19 minutes.

There is an entrance to each charging pump cubicle as illustrated in the attached figure. The entrance to pump nos. 31 and 32, however, is protected by a combination of a full height concrete wall and a partial height metal wall with a door as indicated on the figure. In a similar fashion, the entrance to pump 33 is protected by a partial height metal wall and door. The metal walls extend to approximately 8 feet from the floor. Above the metal walls extending to the ceiling is a metal grating provided for ventilation of the pump cubicles. The full height concrete wall outside fire zones 5 and 6 is approximately 10 feet wide.

The concrete wall and partial height metal walls provide protection for the pumps and their cables from the effects of an exposure fire postulated in the corridor outside the pump cubicles. The high ceilings and large open volume of this floor elevation of the PAB will dilute the accumulation of any combustion products in the vicinity of the pumps. Any products of combustion postulated to enter the pump cubicles would be further diluted by the air volume (approximately 4300 ft.3) in the cubicle. The height of the pump cubicles is approximately 16 feet. Furthermore, the pump cables are located near the floor as they exit the embedded conduit to the Smoke and hot gases entering the cubicles at the ceiling level are not expected to effect the pump power cables. automatic ionization detection system is installed throughout this floor elevation with the exception of the waste evaporator, waste gas compressor rooms (fire zones 19A and 18A) and the air receiver This system would provide prompt detection of a fire in tank area. The openness of the area provides for good manual fire fighting access. Hose stations exist at both ends of the PAB on this elevation and several fire extinguishers are located throughout This elevation of the PAB contains a limited amount of insitu combustibles.

The cables for the three charging pumps are routed in conduit embedded in concrete on this elevation of the PAB until they enter the pump cubicles. See page 6-33 of Reference (1) for a complete

description of the cable routes. Similarly, an alternate power feed is embedded in the floor until it enters fire zone 6 at the transfer switch. As such, a fire in the corridor area outside the pump cubicles is not expected to effect either the normal or alternate power feeds to the pumps. Furthermore, a fire in any one of the pump cubicles is not expected to effect the normal power feeds to the two redundant pumps. A fire in zone 6 may disable the alternate power feed to pumps 31 and 32 as well as the normal feed to pump 32, however the normal feeds to pumps 31 and 33 would be available to affect safe shutdown.

A fire postulated in Charging Pump 32 cubicle, Fire Zone 6, may delay the manual alignment of valve 112B which supplies water to the charging pump suction from the RWST. In this event, the reactor coolant pump seals would be cooled through the thermal barriers with cooling provided by the CCW system. Makeup water to the suction of Charging Pumps 31 and 33 could be provided from either the Volume Control Tank through valve 112C or from the Boric Acid Storage Tanks through MOV-333 using the Boric Acid Transfer Pumps. The Boric Acid Transfer pumps can be supplied power from the emergency diesel generators through manual breaker alignments. An alternate flow path from the Boric Acid Storage Tanks to the Charging pump suction exists via valves FCV-110A and stop valve 293.

While these alternate water supplies exist to supplement the RWST, the Authority does not credit them in the safe shutdown analysis for IP-3. Reactor coolant makeup will not be needed until cooldown is initiated to accommodate the shrink of the reactor coolant. Immediately after reactor trip, the reactor coolant level will be adequate to ensure core cooling and natural circulation. Potential leakage paths from the reactor coolant system have been identified and actions have been prescribed in the safe shutdown procedure to isolate these potential leakage paths. Level indication for the Volume Control Tank and the BAST's is available in the Control Room for the fire scenario postulated in Charging Pump 32 cubicle.

The PAB is a controlled area and the charging pump cubicles are designated radiation areas. As such, access to these areas is limited. Accumulation of transient combustibles is not expected to occur. As previously noted, there are negligible fixed combustibles in both the pump cubicles and the corridor area outside the cubicle entrances.

This information is provided to clarify the configuration of the charging pumps on the 55 ft. elevation of the PAB, as described in Section 6 of Reference (1). Based on the information docketed in Reference (1), as clarified herein, the Authority considers the exemption from the requirement of Section III.G.2 of Appendix R for full area automatic suppression justified.

Separation of Safe Shutdown Cables and Equipment on the 34' Elevation and 55' Elevation (MCC Area) of the Primary Auxiliary Building

A review of the safe shutdown cables and equipment located on the 34 foot and 55 foot (MCC Area) elevations of the Primary Auxiliary Building (PAB) has been performed. The results of this review are summarized herein.

A complete description of Fire Area PAB-2 is provided in Sections 2.4.2 and 6.4 of the Reference (1) report. There are no hot shutdown related components located on the 34' elevation of the PAB, however, hot shutdown component cabling is routed on this elevation of the PAB. These cable routes have been evaluated and compliance with Appendix R Section III.G.2 or III.G.3 currently exists.

The 34' elevation of the PAB is comprised of fire zones 4A, 5A, 6A, 9, 13A, 61A, 62A, 68A, 79A and 662. Access to this elevation of the PAB is via a stairway from the 55' elevation or by ladders from the 41' elevation. This elevation of the PAB has a floor area of approximately 6900 ft.<sup>2</sup>. The combustible loading on this elevation is light with an equivalent fire severity of 1 minute or less for each zone.

The hot shutdown related cabling on the 34' elevation of the PAB is comprised of power feeds for Component Cooling Water Pump 31 and Charging Pump 31. These cables are routed in fire zone 4A which is the corridor outside the safety injection pump room.

The safe shutdown and alternate shutdown cable routes and equipment locations in the PAB are illustrated in Figures 6-4 through 6-7 of the Reference (1) report.

Redundant cabling providing power to Charging Pump 33 is embedded in conduit for its entire route from the lower cable tunnel to the pump cubicle on the 55' elevation of the PAB.

The redundant CCW Pumps (Nos. 32 and 33) power cables are not exposed on this elevation of the PAB, however, they are exposed on the 15' elevation. An alternate power supply is provided to CCW Pump 32. This cable is embedded in conduit, from the lower Cable Tunnel, in the floor of the 34' elevation of the PAB. This power cable exits the embedded conduit at the ceiling level (52' elevation) on the 41' elevation of the PAB west of the CCW Pumps. At this point, the alternate CCW Pump power cable is separated from normal CCW Pump power feeds on the 34' elevation by concrete barriers consisting of walls and floor/ceiling assemblies.

The existing normal and alternate power feeds for the Charging and CCW Pumps, respectively, are routed through the PAB in a manner which ensures conformance with Appendix R Section III.G.

Table 1 summarizes the location, by PAB elevation, of exposed normal and alternate power feeds to the CCW and Charging pumps.

A fire postulated at the motor control centers on the 55' elevation of the PAB could affect the operability of the normal onsite power supplies by disabling the diesel cell ventilation equipment. MCC's in this area also control the motive power to various safe shutdown related valves. Remote operation of the safe shutdown related valves controlled through these MCC's is not credited in the Appendix R evaluation of IP-3. Any necessary valve manipulations can be performed at the valve manually. The Authority has reviewed the locations of the valves for which manual operation is credited. The fire loading in all zones where these manual valve operations are performed is light (6 minutes or less) which precludes fire damage of a nature that would impair the manual operation of the valve. These manual operations are described in Section 4 of the Reference (1) report. Figure 3.3.d of the Reference (1) report designates the safe shutdown equipment powered from the MCC's located on the 55' elevation of the PAB.

In the event of a debilitating fire in this area, safe shutdown could be achieved with the activation of the alternate onsite diesel generator and power supplies and operator action to ensure the safe shutdown related valves are in their appropriate positions. The operator actions necessary to achieve safe shutdown utilizing the alternate onsite power supply are described in Section 4 of Reference (1).

The alternate power feed to the Charging pumps is embedded in conduit for its entire run from the lower Cable Tunnel until it enters Fire Zone 6 in the Charging pump 32 cubicle. The alternate power feed to CCW pump 32 is only exposed on the 41' elevation of the PAB. As such, these cables will be unaffected by a fire at the MCC area.

The alternate power feed to the safe shutdown instrumentation, if needed, is routed outside the PAB. The safe shutdown instrumentation will receive power from the safety related batteries, as designed, upon loss of the normal A.C. power.

The specific configuration of the MCC's on the 55' elevation of the PAB and the fire protection features provided will limit the effects of any postulated fire scenario. The combustible loading in the MCC area is small translating to a 9 minute fire severity (12.760 Access for manual fire fighting is good with a hose BTU/ft<sup>2</sup>). station located at both the east and west ends of this elevation of the PAB. In addition, several fire extinguishers are located on this floor area. Smoke detectors have been installed in the floor area underneath the MCC cubicles as well as at the ceiling above the MCC's. Fire barriers have been installed in the floor area beneath the MCC cubicles to separate redundant safety related cables. detectors will provide early warning of a fire in this area of the PAB and the barriers will provide a level of passive protection against the spread of fire. Furthermore, the availability of both CO2 and water extinguishing agents to the fire brigade will provide a means of prompt fire suppression thereby limiting damage to safe shutdown equipment. Any equipment damage can be compensated for by manual action and through use of the alternate power supply.

TABLE 1

CCW and CHARGING PUMP POWER CABLE LOCATIONS

#### EXPOSED PUMP CABLE

FIRE	ELE'	VATIC	<u>on</u>	<u>cc</u>	<u>ew</u>	CHARGING
	15			32,	33	32
	34			31		31
	41			31, ALT	32,* 32	NONE
		Zone Zone		NONE	3	31 32 Alt. 31 Alt. 32
		Zone	7			33

<sup>\* #33</sup> CCW pump and cable protected by radiant shield and 1 hr. barrier

FIGURE 3

### CHARGING PUMPS - PRIMARY AUXILIARY BLDG. Elev. 55'-0" Fire Area PAB-2

