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New York Power Authority

October 2, 1985
IPN-85-52

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Seismic Qualification of the Auxiliary Feedwater System (AFS)

References: 1) Letter from J.P. Bayne to S.A. Varga dated February 7, 1983 (IPN-83-11) entitled: Seismic Qualification of the Auxiliary Feedwater System (AFS)

2) Letter from J.P. Bayne to S.A. Varga dated May 18, 1983 (IPN-83-41) entitled: Seismic Qualification of the Auxiliary Feedwater System (AFS)

Dear Sir:

The Auxiliary Feedwater System (AFS) at IP-3 was designed in accordance with the seismic category I requirements as formulated in the plant licensing basis. The NRC issued an acceptable Safety Evaluation Report (SER) on September 21, 1973. The SER states in part on page 6-23: "The principal design criteria of the auxiliary feedwater system are that (1) the distribution piping is Category I throughout, (2) the system can withstand a single failure and still meet its performance requirements."

Due to the accident at TMI, the NRC has focused considerable attention on the capability of nuclear power plants to reliably remove decay heat. With this in mind Generic Letter 81-14 "Seismic Qualification of Auxiliary Feedwater System" dated February 10, 1981, was issued to all operating PWR licensees. Based on the Authority's response to this generic letter the NRC issued a Technical Evaluation Report (TER) which identified a portion of the 12 inch piping connecting the hotwell to the AFS suction line that is between valves LCV-1158 and LCV-1128 as seismic class III. The NRC was concerned about this, since, if this section of piping should fail during a seismic event and the single failure is assumed to be the isolation valve LCV-1158, a path is created that would jeopardize the capability of the Condensate Storage Tank (CST) to provide adequate water to the AFS.

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The Authority responded to the NRC's concern by committing to install a new safety related seismic Category I environmentally qualified valve downstream and as close as possible to valve LCV-1158 (Reference 1). The Authority also performed an evaluation which showed that raising the CST low level isolation setpoint would allow the operator sufficient time to manually close valve LCV-1158 if the above mentioned scenario occurred (Reference 2). The appropriate procedures were was revised to incorporate the new CST setpoint and operator action to manually close valve LCV-1158 if it does not close automatically when the CST setpoint is reached. This ensures compliance with the 360,000 gallon Technical Specification minimum requirement.

The new valve has been installed during the current refueling outage. Therefore, the CST setpoint for automatic closure of LCV-1158 and the new valve is being returned to its original setpoint. The appropriate operating procedures will be revised to reflect this change.

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

Very truly yours,

John C. Brons

John C. Brons
Senior Vice President
Nuclear Generation

cc: Resident Inspector's Office
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