



October 11, 1985  
IPN-85- 54

Mr. Harold R. Denton  
Director of Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Compliance to 10 CFR 50.62 - "Requirements for Reduction  
of Risk from Anticipated Transients Without Scram (ATWS)  
Events for Light-Water Cooled Nuclear Power Plants"

Dear Sir:

In accordance with Section 50.62 (d) of 10 CFR Part 50, each licensee shall develop and submit to your office by October 13, 1985, a proposed schedule for meeting the requirements of applicable paragraphs (c)(1) through (c)(5) of this section. Specifically, Section 10 CFR 50.62 (c)(1) requires each PWR to install a system that is diverse from the reactor trip system (RTS), to automatically initiate the auxiliary feedwater system and initiate a turbine trip under conditions indicative of an ATWS. This diverse and independent system has the acronym AMSAC, which stands for Auxiliary (or ATWS) Mitigating Systems Actuation Circuitry.

By letter dated July 15, 1985 (OG-156), the Westinghouse Owner's Group (WOG) submitted to your staff for review and approval Topical Report WCAP - 10858 entitled "AMSAC Generic Design Package". This report describes three (3) conceptual designs, each meeting the 10 CFR 50.62 (c)(1) requirements for Westinghouse - designed PWR's, consisting of the following logics: 1) Steam Generator Low-Low Water Level; 2) Main Feedwater Low Flow and 3) Feedwater Pump and Valve Status. The Authority is a member of the WOG and as such has participated in the development of the Topical Report.

Prior to the issuance of 10 CFR 50.62, the Authority's AMSAC proposed design was based on the Westinghouse analytical results addressed in letter NS-TMA-2182 to the NRC, from T.M. Anderson to Dr. S.H. Hanauer dated December 30, 1979. The proposed circuitry utilized two independent flow transmitters on each of the four main feedwater lines to the steam generators. That design was similar in concept to Logic 2 "AMSAC Actuation on Low Main Feedwater Flow" mentioned above. At that time, however, the NRC published a proposed rule on ATWS which changed the criteria established in the Westinghouse letter. As a result, the Authority suspended the design and procurement efforts pending issuance of the final rule (NYPA letter to NRC dated September 1, 1982).

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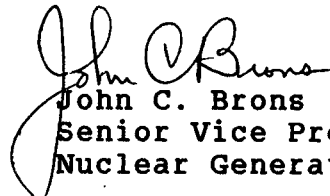
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Currently, the Authority is considering logics one and two described in WCAP-10858 in addition to reevaluating the Authority's previous design. Final selection of an AMSAC logic design is contingent upon the NRC's review and approval of WCAP-10858. The NRC Safety Evaluation Report (SER) is presently expected to be completed by mid-November, 1985. The Authority plans to submit a description of the final design and associated implementation schedule for compliance with the ATWS rule within three (3) months from the issuance of the NRC SER. Also, provided that the staff does not require a plant-specific pre-implementation review, an additional three (3) to four (4) months will be necessary for completing engineering activities required to initiate procurement and twelve (12) to fourteen (14) months are estimated to be required based on lead times for the procurement of hardware. Accordingly, the final AMSAC system selected could be installed during the first scheduled refueling outage following this period which is approximately eighteen (18) months long. This would probably place the IP-3's final implementation beyond the schedule contained in Section 50.62 (d).

In addition, the Authority will follow as appropriate the NRC guidance provided in the "ATWS Equipment Generic Design Criteria" (document to be issued in October 1985) as well as the QA guidance for ATWS non safety-related equipment (Generic Letter 85-06, dated April 16, 1985).

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  
Senior Vice President  
Nuclear Generation

cc: Resident Inspector's Office  
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