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New York Power Authority

John C. Brons
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March 11, 1986
IPN-13-86

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

Attention: Mr. Steven A. Varga,
PWR Project Directorate No. 3
Division of PWR Licensing-A

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Electrical Tunnel Cable Fire Wrap

References: (1) J.P. Bayne letter to S.A. Varga, dated August 16, 1984, forwarding the reevaluation of IP-3 compliance with Sections III.G. and III.L of Appendix R to 10 CFR 50.

(2) J.C. Brons letter to S. A. Varga, dated September 19, 1985, concerning additional information to support the evaluation of IP-3 to 10 CFR 50.48 and Appendix R to 10 CFR 50.

Dear Sir:

Plant modifications which were completed during the last refueling outage enabled the Authority to withdraw an exemption request submitted by Reference (1) which dealt with safe shutdown instrument cables in the entrance to the Cable Tunnels from the Cable Spreading Room.

Specifically, the exemption request was withdrawn since the Authority installed a one-hour barrier around the safe shutdown cables at the the entrance to the Tunnels from the Cable Spreading Room. It was concluded that installation of the one-hour barrier in conjunction with the fire detection and suppression systems achieved compliance with Appendix R for the safe shutdown equipment configuration. Detailed information supporting the Authority's conclusions regarding compliance with Appendix R in this area was included in Attachment 2 to Reference (2).

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In reviewing the completed cable tunnel fire barrier modification, it was determined that the design dimensions of the Cable Tunnel could provide for varying interpretations regarding the acceptability of the installed one-hour fire barrier at the entrance to the tunnels.

Referring to the attached figure, the dimension (length) from the point where the upper/lower tunnel floor/ceiling separates redundant safe shutdown instrumentation channels to the ninety (90) degree bend in the tunnels is approximately 16 feet. The linear distance of the protected cable tray, however, is 20 feet since the tray follows the outside perimeter of the lower tunnel. Cable wrapping has been provided from the wall of the Cable Spreading Room to a point 20 feet (as measured along the cable tray) beyond the point where the floor/ceiling separates the upper and lower tunnels. The current wrap extends into the lower tunnel to the ninety (90) degree bend as shown in the figure. At the point where the wrap ends, the redundant Train A instrumentation cables are located above the protected Train B cables in the upper tunnel and separated by the 3 hour rated floor/ceiling assembly. As previously noted, smoke detectors and sprinkler protection is provided in both the upper and lower tunnels.

To alleviate any potential for differences in interpretation of Appendix R requirements, the Authority will install additional cable wrapping in the entrance to the cable tunnels such that the protection of safe shutdown instrumentation will extend beyond the ninety (90) degree bend in the tunnels. This work will be expedited in order to complete it prior to startup from the mid-cycle outage. A roving fire watch has been established in the area and will continue until the necessary work is complete.

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
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cc: Resident Inspector's Office
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