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March 29, 1990
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U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attn: Document Control Desk

Subject: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Station Blackout Supplementary Information

- References:
1. NUMARC letter, Byron Lee to the NUMARC Board of Directors, regarding Station Blackout supplemental information, dated January 4, 1990.
 2. NYPA letter, J. C. Brons to the NRC, "Response to 10 CFR Part 50.63, Loss of All Alternating Current Power - Station Blackout," dated April 17, 1989 (IPN-89-025).
 3. NYPA letter, J. C. Brons to the NRC, "Response to 10 CFR Part 50.63, Loss of All Alternating Current Power - Station Blackout," dated April 17, 1989 (JPN-89-018).
 4. NUMARC Report No. 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors," dated November 20, 1987.

Dear Sir:

As requested by Reference 1, the Authority has reviewed the Indian Point 3 (IP3) and James A. FitzPatrick (JAF) Station Blackout (SBO) programs and is submitting the following information regarding SBO program implementation.

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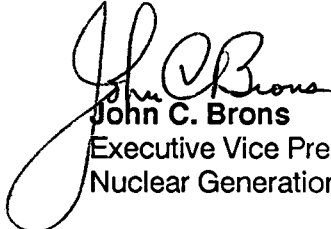
In References 2 and 3, the Authority assessed IP3 and JAF compliance with the SBO rule, 10 CFR 50.63. Those assessments included the determination of the required coping duration (four hours) and evaluation of the coping capability independent of AC power. The FitzPatrick plant is an AC-independent plant and is required to cope independent of AC power for four hours. IP3 is an Alternate AC plant, and all coping evaluations were performed for the time during which no AC power is available (one hour). Compliance with the SBO rule was assessed based on the methodology contained in NUMARC 87-00 (Reference 4), with one exception. NUMARC 87-00 addresses containment isolation on a valve-by-valve basis and does not consider any redundancy in isolation capability provided for a given penetration. The Authority's approach for the FitzPatrick plant differed from this methodology. The FitzPatrick approach was to ensure that each line penetrating containment required to be isolated during an SBO event was isolated by a minimum of one fail-closed valve, locked closed valve, check valve, valve interlocked with another valve, or DC powered motor-operated valve. This approach is consistent, however, with the NUMARC 87-00 assumption that independent failures need not be considered during SBO mitigation.

The Authority has reviewed the recent supplemental guidance of Reference 1 and attachments thereto and reaffirms the use of the NUMARC 87-00 guidance for evaluating compliance with 10 CFR 50.63 for both plants (with the exception noted above). The applicability of the major NUMARC 87-00 assumptions specified in Attachment II to Reference 1 have been verified for IP3 and JAF.

No modifications were required at IP3 to implement the SBO program. A specific implementation schedule for modifications at JAF will be submitted in accordance with 10 CFR 50.63 (c) (4). Currently, neither plant's Emergency Diesel Generator (EDG) reliability program is complete. As stated by References 2 and 3, the Authority's EDG target reliability is 0.975 for IP3, and 0.95 for JAF. The Authority is awaiting the resolution of Generic Safety Issue B-56, "Diesel Generator Reliability," and receipt of further guidance in the form of a revision to NUMARC 87-00, Appendix D, prior to finalization of the EDG reliability programs.

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

Very truly yours,


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cc: See next page

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