



Ralph E. Beedle
Executive Vice President
Nuclear Generation

May 9, 1991
IPN-91-016

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
Regulatory Guide 1.97, Revision 3

- References:
1. Letter from NRC (Joseph D. Neighbors) to NYPA (Ralph E. Beedle), dated April 3, 1991, entitled: "Emergency Response Capability - Conformance to Regulatory Guide 1.97, Revision 3, for Indian Point 3 (TAC No. 51099)."
 2. Letter from NYPA (John C. Brons) to NRC (Steven A. Varga), dated January 7, 1986 (IPN-86-05), entitled: "Regulatory Guide 1.97 Implementation Program."
 3. Letter from NYPA (John C. Brons) to NRC, dated June 23, 1989 (IPN-89-035), entitled: "Detailed Control Room Design Review."

Dear Sir:

Reference (1) transmitted the NRC's safety evaluation regarding Indian Point 3's (IP3's) conformance to Regulatory Guide 1.97 (RG 1.97) requirements. The NRC staff identified two unacceptable deviations from RG 1.97 requirements. As requested by Reference (1), this letter provides the Authority's response regarding implementation of the staff's positions on the identified items.

It is the staff's position that the key variable for the accumulator tank must be provided with the RG 1.97 recommended range; that is, 10 to 90 percent volume for level or 0 to 750 psig for pressure, in order to qualify as Category 2 instrumentation. The Authority originally provided Category 3 instrumentation and committed to upgrade the key variable to Category 2 standards. This information was contained in Reference (2). The Authority has since upgraded the pressure variable to extend to full range (750 psig). The modification was installed during the Cycle 5/6

9105150283 910509
PDR ADCK 05000286
P PDR

A003

Refueling Outage in August of 1987. It is therefore the Authority's position that this item can be satisfactorily closed.

RG 1.97 recommends that Types A, B, and C instruments designated as Category 1 and 2 should be specifically identified with a common designation on the Control Room control panels so that the operator can easily discern that they are intended for use under accident conditions. Reference (3) provided the Authority's determination that such markings were not necessary. The NRC staff, however, disagrees with the Authority's position. It is the staff's position that, at a minimum, identification of Type A and Category 1 RG 1.97 instrumentation is necessary.

While it is still the Authority's position that identifying instruments on the control panels is unnecessary for the reasons discussed in Reference (3), at this time the Authority will commit to implement the NRC staff's position. Therefore, the Authority shall mark Type A and Category 1 Control Room instrumentation with a common designation by start-up from the Cycle 8/9 Refueling Outage. If future developments support that such markings would be detrimental from a human factors point of view, then the NRC staff will be notified.

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

Very truly yours,



Ralph E. Beedle
Executive Vice President
Nuclear Generation

cc: U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, New York 10511

Mr. Francis J. Williams Jr., Project Manager
Project Directorate I-1
Division of Reactor Projects-I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, D.C. 20555