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Executive Vice President  
Nuclear Generation

June 25, 1993  
IPN-93-068

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Subject: **Indian Point 3 Nuclear Power Plant**  
**Docket No. 50-286**  
**Comments on Preliminary Evaluation of Licensee**  
**Event Report 286/92-011, "Multiple EDGs Simultaneously**  
**Inoperable." Input to Accident Sequence Report for 1992**

Reference: 1. Letter from Nicola F. Conicella (NRC) to Ralph E. Beedle, dated June 11, 1993, entitled, "Preliminary Evaluation of Indian Point Nuclear Generating Unit No. 3, Licensee Event Report 286/92-011, 'Multiple EDGs Simultaneously Inoperable,' Input to Accident Sequence Report for 1992."

Dear Sir:

On June 11, the NRC requested comments on the preliminary evaluation of Licensee Event Report Number 286/92-011 (Reference 1). Attachment I contains comments on your preliminary evaluation.

If you have any questions, please contact Mr. P. Kokolakis.

Very truly yours,

Ralph E. Beedle

cc: see next page  
attachments: as stated

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ATTACHMENT I TO IPN-93-068

**COMMENTS**

**RELATED TO**

**PRELIMINARY EVALUATION OF LER NUMBER 286/92-011**

NEW YORK POWER AUTHORITY  
INDIAN POINT 3 NUCLEAR POWER PLANT  
DOCKET NO. 50-286  
DPR-64

## Comments

The following comments address 1) the ASP analysis characterization of the possible plant response as the result of the event, 2) whether the analysis reasonably represents the plant safety equipment configurations and capabilities which existed at the time of the event, and 3) the analyst's assumptions regarding equipment recovery probabilities:

A clear description of event tree headings should be made. There are no references to the sources used for initiating event probabilities nor component unavailabilities.

There is no reference for the probability of reactor coolant pump seal LOCA. If WCAP 10541 was used to derive this value, a lower value than 0.21 should be considered given lower RCS pressure at the onset of seal failure. IP-3 emergency operating procedure (EOP) ECA 0.0, "Loss of All AC Power," directs operators in step 21 to immediately depressurize steam generators to effectively cool down and depressurize the reactor coolant system. At lower reactor coolant system pressure, WCAP 10541 shows a seal LOCA probability of 0.108.

In sequence 53, the probability of non-recovery of AC power should consider non-recovery of the Appendix R diesel generator and Buchanan substation gas turbines.

Sequence 51, failure of high pressure recirculation (given successful high head injection), assumes that one EDG is restored after a seal LOCA condition has occurred. It is not clear how the probability of loss of high pressure recirculation was derived. This sequence probability may be much lower considering the facts below:

- In section B.13.3 of the report, the FSAR success criteria of two-out-of-three EDG's required to power the minimum service and component cooling water pumps was used. However, in reality, operators are directed by the EOPs to close non-essential service water header valves FCV-1111 and FCV-1112 to prevent service water pump runout during one pump operation. Component cooling water will be available for decay heat removal under these conditions. Recirculation failure probability determination would have to include failure to perform this action as well.
- Operators are directed by the EOPs, if only one EDG can be restored, to start and load the Appendix R diesel generator which will make an additional service and component cooling water pump available. This sequence models high head injection as successful. If the restored 480-V ac bus does not have an associated recirculation pump (as in buses 2A/3A), RHR pump 31 along with high head injection pump 32 can be used together in external recirculation mode.