

Indian Point 3
Nuclear Power Plant
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February 14, 1984
IP3-JAS-545

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Emergency Preparedness Appraisal 50-286/81-05

Dear Mr. Martin:

The purpose of this letter is to provide additional information concerning the status of two long term completion items originally noted during appraisal 81-05. The long term items are: 81-05-10 (Appendix B, item 8) the determination of the representativeness of post-accident airborne effluent particulate sampling and 81-05-11 (Appendix A, item 3) sampling of post-accident liquid effluents.

As noted in follow-up inspection (Report No. 50-286/82-22), item 81-05-10 requires plant operation to allow collection of empirical data in order to perform an engineering evaluation of the sampling system and to determine if any loss correction factors are necessary. Approximately nine months of operating data, followed by three months of analysis is needed to complete this item. As you are aware, we have been unable to obtain the needed operating time. Based on the current operating schedule for the Indian Point 3 station, the Authority expects to complete this item by June 1985.

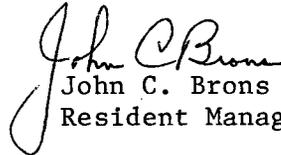
Item 81-05-11 was identified during a review of the Authority's ability to effectively sample and analyze high activity liquid effluents during accident situations. The inspectors noted that in order to achieve an acceptable program it was necessary for the Authority to develop plans/schemes and procedures for handling, storing, transferring, analyzing and discharging post-accident liquid wastes. By letter dated December 22, 1981 (IP-LML-15850) the Authority committed to addressing these concerns. During follow-up inspection 82-22, the inspectors noted that interim measures were in place and an engineering study was in progress and the installation of a sampling system was anticipated to be completed in January 1984. Item 81-05-11 was closed and the installation of the liquid waste sampling system was identified as follow item 82-22-01. The engineering study has since been completed but installation of the sampling system has not begun.

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After reviewing this issue in detail, it is the Authority's position that the high activity liquid waste sampling system is not presently needed nor is it a NRC requirement. As stated above, this item was identified during a review of liquid effluent sampling. During an accident situation, the containment building would be isolated and there would be no release of liquid effluents. The various TMI action plans have outlined improvements in containment isolation dependability. Post accident instrumentation and sampling requirements are outlined in NUREG 0737 and Reg. Guide 1.97. Neither of these documents contain guidance for post accident liquid effluent sampling. While the Authority understands the inspectors' concerns in this area, the need to handle and transfer high activity liquid wastes would occur after a highly unlikely postulated accident. Since the circumstances requiring the transfer and sampling after an accident are unpredictable, the Authority concludes that "ad hoc" measures would be instituted and the installation of a fixed sampling system is not warranted.

Should you or your staff have any questions regarding this matter, please contact Mr. J. Schivera of my staff.

Very truly yours,


John C. Brons
Resident Manager

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cc: IP3 Resident Inspectors' Office

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