POWER AUTHORITY OF THE STATE OF NEW YORK
10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019
(212) 397-6200

July 13, 1979
JPN-79-41
INP-79-46

Ms. Reba M. Diggs
Facilities Program Coordinator
License Fee Management Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Application Fee for Review of Safeguards
Contingency Plans

Dear Ms. Diggs:

In response to your letter of July 3, 1979 on the subject items, the Authority classifies these as Class III, as they involve the single safety issue of the safeguards contingency plans. Enclosed are two checks in the amount of $4,000 for each facility as the filing fee per 10 CFR §170.22, which the Authority pays under protest pending a final determination of the legality of the fee schedule.

Very truly yours,

Paul J. Early
Assistant Chief Engineer-Projects

Moos 1/0

F.lm

7/18/79

NOTE TO: Mike Collins & Don Lanham, DSB (016)

FROM: Reba Diggs, License Fee Management Branch, ADM

SUBJECT: PROCESSING LETTERS WITH CHECKS RECEIVED DIRECTLY BY THE LICENSE FEE MANAGEMENT BRANCH

Please process the enclosed letter under the applicable docket and give the following distribution under code M008:

Original of ltr to Regulatory Docket File
Action Cy w/check to W. O. Miller, LFMB (L-233)
3 cys to applicable Branch of DOR or DPM
1 to LPDR
1 to PDR

I am retaining the check and the following information is for your records.

Check No.: 11343
Amount: $8,000—
Date: 7/13/79
Ltr. Date: 7/13/79
Applicant: PASNY
Docket No: 50-286/333
Plant: Fitzpatrick/Indian Point 3

Thanks!

Sharon L. Custer for

Reba M. Diggs
License Fee Management Branch
Office of Administration

MAY 21 1979

Docket No. 50-286

Mr. George T. Berry
General Manager and Chief Engineer
Power Authority of the State of New York
10 Columbus Circle
New York, New York 10019

Dear Mr. Berry:

During the site visit of members of our Fire Protection Review Team to Indian Point Unit 3 on May 3-4, 1979, a request for additional information regarding your proposed alternate shutdown capability was left with your staff. A copy of this request is enclosed.

We are also enclosing with this letter a copy of our staff positions that were discussed with your staff during that visit. We ask that you respond to these requests and positions within 30 days of receipt of this letter.

Sincerely,

Original Signed By

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosures:
1. Request for Additional Information
2. Staff Positions

cc: w/enclosures
See next page

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V. Stello	OELD	TERA	

7907110771

OFFICE	DOR:ORB1	DOR:ORB1				
SURNAME	LNOlshan:jb	ASchwencer				
DATE	05/21/79	05/21/79				

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 21, 1979

Docket No. 50-286

Mr. George T. Berry
General Manager and Chief Engineer
Power Authority of the State of New York
10 Columbus Circle
New York, New York 10019

Dear Mr. Berry:

During the site visit of members of our Fire Protection Review Team to Indian Point Unit 3 on May 3-4, 1979, a request for additional information regarding your proposed alternate shutdown capability was left with your staff. A copy of this request is enclosed.

We are also enclosing with this letter a copy of our staff positions that were discussed with your staff during that visit. We ask that you respond to these requests and positions within 30 days of receipt of this letter.

Sincerely,

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosures:
1. Request for Additional Information
2. Staff Positions

cc: w/enclosures
See next page

cc: White Plains Public Library
100 Martine Avenue
White Plains, New York 10610

Mr. Lewis R. Bennett
Assistant General Manager -
General Counsel
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Anthony Z. Roisman
Natural Resources Defense Council
917 - 15th Street, N.W.
Washington, D. C. 20005

Dr. Lawrence D. Quarles
Apartment 51
Kendal at Longwood
Kennett Square, Pennsylvania 19348

Mr. George M. Wilverding
Licensing Supervisor
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Mr. P. W. Lyon
Manager - Nuclear Operations
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Mr. J. P. Bayne, Resident Manager
Indian Point 3 Nuclear Power Plant
P. O. Box 215
Buchanan, New York 10511

Mr. J. W. Blake, Ph.D., Director
Environmental Programs
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Theodore A. Rebelowski
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION
INDIAN POINT 3 FIRE PROTECTION
DOCKET NO. 50-286

1. Verify that changes to safety systems will not degrade safety systems. (e.g., new isolation switches, control switches, and instrumentation, should meet the same design criteria and standards in the FSAR for electrical equipment in the system that the switch is to be installed; cabinets that the switches and instrumentation are to be mounted in should also meet the same criteria (FSAR) as other safety related cabinets and panels, including seismic, and a single transfer switch or other new device should not be a source for a single failure to cause loss of redundant safety systems.)

2. Verify that procedure(s) will be developed which describe the tasks to be performed to effect the alternate shutdown method. Provide a summary of these procedures to be reviewed by the staff.

3. Identify the manpower required to achieve safe shutdown independent of the cable spreading room. Verify that the manpower required to perform the alternate shutdown functions using the procedures of 2. (above) as well as to provide fire brigade members to fight the fire is available as required by the fire brigade technical specifications.

4. Describe the acceptance tests to be performed. These should verify that: equipment operates from the local control station when the transfer or isolation switch is placed in the "local" position and that the equipment cannot be operated from the control room; and that equipment operates from the control room but cannot be operated at the local control station when the transfer or isolation switch is in the normal position.

5. Technical Specifications including the surveillance requirements and limiting conditions for operation for new instrumentation should be provided.

6. Provide simplified one line diagram(s) showing typical circuits for diesel generator control, diesel generator breaker control and instrumentation at the new instrument panel after modifications. The drawing or sketch should show normal and remote control points and identify those portions of the circuit that are located in the cable spreading room.

7. On equipment layout or cable raceway layout drawings, show the routing of generator control cables, of generator breaker control cables, and cables for the new instrumentation that will be used to effect safe shutdown independent of the cable spreading room.

8. Control circuits that may be used to effect safe shutdown typically contain fuses for overcurrent protection. These fuses may be blown by the effects of a cable spreading room fire and thus power may not be available for these control circuits even after isolating the cable spreading room cables by operating remote disconnect or transfer switches. Verify that for systems required to effect safe shutdown independent of the cable spreading room, spare fuses are available in the area of the existing control circuit fuses and the procedure used for shutdown by this method informs the operator to check these fuses if equipment fails to operate.

STAFF POSITIONS

INDIAN POINT 3 - FIRE PROTECTION

DOCKET NO. 50-286

1. During the site visit of May 3 and 4, 1979, it was noted that some cabling was located in a below-floor space in the MCC area of the Primary Auxiliary Building. If any of these cables are safety related, smoke detection devices should be located in the below floor space.

2. During the above referenced site visit, we were informed of the planned location for the 3-hour wall referenced in the PASNY letter of April 16, 1979 to be located between the cable tunnels and cable spreading room. With this location, an open area would exist between the end of the tunnels and the new wall. This open area will contain redundant safe shutdown cables. The staff concern is that the proposed fire protection using closed heads adjacent to the trays may not be effective in detecting and suppressing a fire in this area. Although manual suppression may be available to suppress a fire and protect redundant cables, we prefer to not place primary reliance on the fire brigade to prevent a fire from affecting redundant safety divisions. To provide adequate overall protection for cables in this area between the cable spreading room and the cable tunnels, one of the following should be provided:

   a. Extend the floor/ceiling separating the tunnels with a 3-hour rated barrier up to the new wall;

   b. Extend the closed head spray nozzles into the tray area so that nozzles are located above the trays, and use horizontal sidewall type nozzles to provide coverage of the trays. This type arrangement should extend for at least 15 feet into the tunnels, or

   c. Use open head spray nozzles in this area and extending for at least 15 feet into the tunnel. The system should be actuated by detection devices located above the cable trays.

   If alternative (b) or (c) is chosen, the suppression systems protecting cables on each side of this open area should be on separate feeds such that failure or isolation of any section of fire suppression piping will not incapacitate both systems.

3. Barriers are provided at certain locations inside containment to separate redundant safe shutdown instrumentation cabling. No barriers are provided between redundant instrumentation cabling at the penetration area. To provide adequate separation between redundant cabling, both the following should be met:

   a. Provide test data to demonstrate the adequacy of the existing barriers to prevent a fire below the barrier from damaging cables

in trays above the barrier, or install tested thermal barriers, such as Kao-Wool, to insulate the lower cable tray containing instrumentation cables of one channel where the redundant instrumentation cable trays are stacked above each other. The fire barrier installation should conform to a design which has been tested to demonstrate a 1-hour fire rating, and

b. Thermal barriers, as above, should also be installed to enclose one channel of safe shutdown instrumentation both where the cabling crosses from the stack of trays over to the penetration area, and at the penetration area. An alternative to this would be to provide tested barriers to separate cable trays presenting an exposure hazard to the safe shutdown instrumentation. The channel to be protected should also be the channel that is located in the lowest tray where the redundant instrumentation cable trays are stacked above each other (channel 4).

MAY 8 1979

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Olshan, ORB-1
RMDiggs, LFMB

DOCKET NO. 50-286

Power Authority of the State of New York
ATTN: Mr. Paul J. Early
Assistant Chief Engineer - Projects
10 Columbus Circle
New York, New York 10019

Gentlemen:

This office has received a copy of your March 29, 1979 submittal of a revised Emergency Plan for Indian Point Unit No. 3 (Facility License No. DPR-64) which you transmitted to the Office of Nuclear Reactor Regulation (NRR). It is our understanding that the NRR Staff will review the revised plan and issue a letter of approval, or otherwise, specifying their findings as to whether the revised plan meets the requirements of Appendix E of 10 CFR Part 50 and other current NRC guidance. Consequently, your March 29 filing is subject to the fee requirements of 10 CFR Part 170. Reviews and approvals relating to a particular power plant should be classified in the same manner as applications for license amendments and fees determined and paid pursuant to Section 170.22 of 10 CFR Part 170. Section 170.12(c) requires that your company provide a proposed determination of amendment (approval) class, state the basis therefor, and submit the fee with your filing and/or amendment application.

Based on a preliminary review of your March 29 filing, we have determined that it falls in fee Class III requiring $4,000 because it involves consideration of single safety issue. You should forward the fee of $4,000 promptly to this office. If after final review of your filing it is determined that it was incorrectly classified, you will be refunded any overpayment or billed for any additional amount due.

Sincerely,

Original Signed by
Wm. O. Miller

7906040144

App3 ccp

William O. Miller, Chief
License Fee Management Branch
Office of Administration

OFFICE	LFMB:ADM	LFMB:ADM	LFMB:ADM			
SURNAME	RMDiggs	CJHeltemes	WOMiller			
DATE	5/7/79	5/7/79	5/7/79			

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Docket 50-286

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MARCH 12 1979

ALL POWER REACTOR LICENSEES

Gentlemen:

The NRC staff finds it necessary to request additional information regarding the capability of your NSSS(s) to respond to postulated ATWS transients. We have chosen, for reasons of resource conservation and efficiency, to send our request for this information directly to the NSSS vendors and to initiate discussions regarding the nature, extent and schedule of the responses directly with your vendor(s).

Enclosed for your information is a copy of a letter which was sent to General Electric Company, Westinghouse Electric Corporation, Combustion Engineering, Inc., and Babcock and Wilcox Company, transmitting a request for information needed to perform generic analyses related to ATWS.

The analyses requested are to confirm that the proposed modifications for various classes of Light Water Reactor (LWR) designs accomplish the degree of ATWS prevention and mitigation described by the staff in Volume 3 of NUREG-0460 (enclosed).

We expect that the vendors will find it necessary to obtain some of this information from you. We are asking that you provide this information in order to base ATWS rulemaking on generic confirmation, and thereby avoid costly and unnecessary repetitive analysis. Although you will not receive this letter prior to the March 1, 1979 meeting referred to, we understand that you were contacted by the AIF or the respective vendor concerning the meeting. Should you desire an additional meeting on the generic analyses requested or have additional questions, please contact Mr. Ashok Thadani, (301) 492-7341.

Sincerely,

NRR3 CCP

Richard H. Vollmer, Assistant Director
for Systems and Projects
Division of Operating Reactors

Enclosures:
1. Letter to General Electric Company dtd. 2/15/79
2. NUREG-0460, Volume 3

cc w/enclosure 1:
Service List

7904090290

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 15 1979

Dr. Glenn G. Sherwood, Manager
Safety and Licensing
General Electric Company
175 Curtner Avenue
San Jose, California 95125

Dear Dr. Sherwood:

In Volume 3 of NUREG-0460, the Nuclear Regulatory Commission's (NRC's) staff report on Anticipated Transients Without Scram (ATWS), it was recommended that prior to the Commission's consideration of a proposed ATWS regulation, certain generic safety analyses should be performed. These analyses are to confirm that the proposed modifications for various classes of Light Water Reactor (LWR) designs accomplish the degree of ATWS prevention and mitigation described by the staff in Volume 3 of NUREG-0460. The Regulatory Requirements Review Committee has concurred with the generic analysis approach and the Director of the Office of Nuclear Reactor Regulation has authorized the staff to proceed. If the generic analysis approach is successful, the rule to be proposed for Commission action will not treat ATWS as a design basis accident and will not require a new safety analysis of ATWS on each licensing case. There might be specific exceptions in the future where an analysis for a particular design would be desirable or necessary because the present generic analyses do not envelop that specific design or some future, unanticipated mode of normal operation.

Generic questions and guidelines are provided in Enclosure 1 for two kinds of plant modifications recommended in Volume 3 of NUREG-0460. These are the Alternative 3 modifications for plants receiving a Construction Permit prior to January 1, 1978, and the Alternative 4 modifications for plants receiving a Construction Permit after January 1, 1978. The plants listed in Enclosure 2 which began operation prior to Dresden 2 will be treated according to Alternative 2 of Volume 3 and will be examined on a case-by-case basis after the ATWS rule is promulgated in its final, effective form.

We require that by April 15, 1979, the four LWR vendors provide responses to the questions in Enclosure 1 applicable to their designs. Responses to some of the questions can be delayed until June 1, 1979. These are noted by an asterisk or footnote in the enclosure.

For this generic analysis approach to be successful, it is imperative that: a) the responses be complete; b) the responses cover all LWR designs for each vendor, except the plants in Enclosure 2; c) consideration be given in the selection of analysis parameters to envelope the nominal conditions for these designs and their anticipated modes of operation as specified in Enclosure 1 so as to minimize the need for ATWS reanalysis in the future; and d) applicants and licensees provide the necessary support to the four LWR vendors to complete these generic analyses in the required time frame.

The time available to complete the generic analyses is short. Therefore, it is important that the questions be fully understood and that the answers be as complete as possible so that our review does not bog down with an iteration of questions and answers. To this end we have scheduled a meeting in Bethesda, Maryland, Room P-118, for all day March 1, 1979, to explain and discuss the questions with representatives from the four LWR vendors. It may be necessary to further subdivide the question list at that time to assure timely submission of the generic analyses necessary for the staff to complete its drafting of the proposed ATWS rule in May. The meeting will be open to interested members of the public. Representatives of interested and potentially affected utilities are also invited to attend by copy of this letter.

Sincerely,

Roger J. Mattson, Director
Division of Systems Safety
Office of Nuclear Reactor
Regulation

Enclosures:
1. Generic Questions
2. List of Plant for Alternative 2

Mr. George T. Berry
Power Authority of the State of New York

cc: White Plains Public Library
100 Martine Avenue
White Plains, New York 10610

Mr. Lewis R. Bennett
Assistant General Manager -
General Counsel
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Anthony Z. Roisman
Natural Resources Defense Council
917 - 15th Street, N.W.
Washington, D. C. 20005

Dr. Lawrence D. Quarles
Apartment 51
Kendal at Longwood
Kennett Square, Pennsylvania 19348

Mr. George M. Wilverding
Licensing Supervisor
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Mr. P. W. Lyon
Manager - Nuclear Operations
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Mr. J. P. Bayne, Resident Manager
Indian Point 3 Nuclear Power Plant
P. O. Box 215
Buchanan, New York 10511

Mr. J. W. Blake, Ph.D., Director
Environmental Programs
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Theodore A. Rebelowski
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

FEB 21 1979

Docket No. 50-286

Mr. George T. Berry
General Manager and Chief Engineer
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10019

Dear Mr. Berry:

To continue our investigation of the December 6, 1978 steam generator tube leak at Indian Point, Unit 3, we have enclosed a request for additional information.

Provide the information requested within sixty days of the date of this letter.

Sincerely,

151

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosure:
Request for Additional
Information

cc: w/enclosure
See next page

App3
ccp

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D. Eisenhut	ACRS (16)
R. Vollmer	

7903200016

TAC 11205 (RFAI)

OFFICE	DOR:ORB1	DOR:ORB1				
SURNAME	LNOlshan:jb	ASchwencer				
DATE	02/21/79	02/21/79				

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Power Authority of the St. of NY
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New York, New York 10019

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Natural Resources Defense Council
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Assistant Attorney General
State of New York
Department of Law
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Sarah Chasis, Esquire
Natural Resources Defense Council
122 East 42nd Street
New York, New York 10017

Mr. George M. Wilverding
Licensing Supervisor
Power Authority of the State
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10 Columbus Circle
New York, New York 10019

Mr. P. W. Lyon
Manager - Nuclear Operations
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10019

Mr. J. P. Bayne, Resident Manager
Indian Point 3 Nuclear Power Plant
P. O. Box 215
Buchanan, New York 10511

Power Authority of the State of
New York
Environmental Programs
J. W. Blake, Ph.D.
Director
10 Columbus Circle
New York, New York 10019

Theodore A. Rebelowski
USNRC
P. O. Box 38
Buchanan, New York 10511

REQUEST FOR INFORMATION REGARDING

STEAM GENERATOR OPERATING EXPERIENCE AT

INDIAN POINT UNIT 3

1. Provide your analysis of secondary water chemistry to assess the cause of tube denting, and to identify if a new phenomenon of tube denting is occurring.

2. Provide a commitment to submit your inspection program for the next scheduled inservice inspection at least two months prior to the inspection for NRC staff comment. This submittal should include a map indicating the tubes to be inspected and the extent of eddy current testing and gauging to be performed.

3. Provide a summary of any tentative remedial actions intended to eliminate or control denting, such as secondary water chemistry controls or chemical cleaning, which may be under consideration.

FEB 2 1979

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RMDiggs, LFMB

1 copy

DOCKET NOS. 50-286/-3/-247

Power Authority of the State of New York
ATTN: Mr. Paul J. Early
Assistant Chief Engineer - Projects
10 Columbus Circle
New York, New York 10019

Gentlemen:

This office has received a copy of the September 14, 1978 application which your company and the Consolidated Edison Company of New York, Inc., jointly filed with the Office of Nuclear Reactor Regulation for review and approval. The application proposed Environmental Technical Specification (ETS) changes for Indian Point Station Units Nos. 1, 2 and 3 relating to continuous chlorination of the effluent from the new sewage treatment facility at Indian Point Unit No. 3. The application was accompanied by a Class III amendment fee of $4,000 because you determined that it involved a single environmental issue.

From our preliminary review of your application, we agree that a Class III fee is appropriate for Unit No. 3. Because your application requested, and requires, duplicate amendments to Facility Licenses DPR-5 and DPR-26 for Units Nos. 1 and 2, two Class I fees are also required for the duplicates. Although Indian Point Unit No. 1 is not essentially identical to Units Nos. 2 and 3, we have applied the duplicate fee criteria because all units are at the same site with the same applicable common ETS. It is requested that the additional sum of $800 be forwarded to this office promptly. If after our final evaluation of your September 14 application is completed it is determined that it was incorrectly classified, you will be refunded any overcharges or billed for any additional amount due.

If we can be of assistance, call 301/492-7225.

Sincerely,
Original Signed by:
Reba M. Diggs

Reba M. Diggs
License Fee Management Branch
Office of Administration

7902260082

cc: Consolidated Edison Company
of New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

OFFICE			LFMB:ADM	LFMB:ADM	
SURNAME			RMDiggs:slc	GHolloway	
DATE			2/1/79	2/1/79	

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CParrish, ORB-1
XX

FEB 2 1979

DOCKET NOS. 50-3/-247/-286

Consolidated Edison Company
of New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

Gentlemen:

This office has received a copy of the December 5, 1978 application which your company and the Power Authority of the State of New York jointly filed with the Office of Nuclear Reactor Regulation for review and approval. The application proposed Environmental Technical Specification (ETS) changes for Indian Point Station Units Nos. 1, 2 and 3 relating to calculation of the rate of discharge of heat from the units to the river and reporting requirements. The application was accompanied by a Class II amendment fee of $1,200 because you determined that it has no safety or environmental significance.

From our preliminary review of your application, we agree that a Class II fee is appropriate for one of the units. Because your application requested, and requires, duplicate amendments for the other two units, two Class I fees are also required. Although Indian Point Unit No. 1 is not essentially identical to Units Nos. 2 and 3, we have applied the duplicate fee criteria because all units are at the same site with the same applicable common ETS. It is requested that the additional sum of $800 be forwarded to this office promptly. If after our final evaluation of your December 5 application is completed it is determined that it was incorrectly classified, you will be refunded any overcharges or billed for any additional amount due.

If we can be of assistance, call 301/492-7225.

Sincerely,
Reba M. Diggs

Reba M. Diggs
License Fee Management Branch
Office of Administration

7902260606

cc: Power Authority of the State of New York
ATTN: Mr. Paul J. Early
Assistant Chief Engineer - Projects
10 Columbus Circle
New York, New York 10019

OFFICE ▶	LFMB:ADM	LFMB:ADM		
SURNAME ▶	RMDiggs:lc	CJHolloway		
DATE ▶	2/2/79	2/2/79		

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C. Parrish
I&E (3)
OELD
TERA
J. Buchanan
ACRS (16)

Docket No. 50-~~286~~ 286

Mr. George T. Berry
General Manager and Chief Engineer
Power Authority of the
State of New York
10 Columbus Circle
New York, New York 10019

Dear Mr. Berry:

In reviewing your fire protection program, we have identified additional information we need regarding your administrative controls. These requests for additional information are enclosed.

For us to maintain our fire protection review schedule for your plant, with minimum conflict with our review of fire protection programs for other plants, we ask that you respond to the enclosed requests by January 31, 1978. A copy of the enclosure was telecopied to you on December 12, 1978. Thank you for your cooperation.

Sincerely,

ORIGINAL SIGNED

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosure:
Request for
Additional Information

cc: w/enclosure
See page 2

~~781227~~0486

APP-3

OFFICE	DOR:ORB1	DOR:ORB1				
SURNAME	LOlshan:jb	ASchwencer				
DATE	12/12/78	12/12/78				

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cc: White Plains Public Library
100 Martine Avenue
White Plains, New York 10610

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Assistant General Manager-
General Counsel
Power Authority of the St. of NY
10 Columbus Circle
New York, New York 10019

Anthony Z. Roisman
Natural Resources Defense Council
917 - 15th Street, NW
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Paul S. Shemin, Esquire
Assistant Attorney General
State of New York
Department of Law
Two World Trade Center
New York, New York 10047

Sarah Chasis, Esquire
Natural Resources Defense Council
122 East 42nd Street
New York, New York 10017

Mr. George M. Wilverding
Licensing Supervisor
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10019

Mr. P. W. Lyon
Manager - Nuclear Operations
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10019

Mr. J. P. Bayne, Resident Manager
Indian Point 3 Nuclear Power Plant
P. O. Box 215
Buchanan, New York 10511

Power Authority of the State of
New York
Environmental Programs
J. W. Blake, Ph.D.
Director
10 Columbus Circle
New York, New York 10019

Theodore A. Rebelowski
USNRC
P. O. Box 38
Buchanan, New York 10511

Enclosure 1
Administrative Controls
Indian Point Unit-3 Fire Protection
Docket No. 50-286

1. Identify the upper level offsite management position which has overall management responsibility for the fire protection program including periodic assessment of the effectiveness of the Indian Point-2 fire protection program.

2. The comparison of the Indian Point-3 fire protection program to BTP 9.5-1 contained in the "Review of the Indian Point Station Fire Protection Program" did not address the following items. The following should be included in the Indian Point-3 fire protection program:

   (a) Responsibilities of the fire brigade members in a fire emergency should be assigned to each brigade member or brigade position. These responsibilities should not conflict with the brigade member's responsibilities under normal plant conditions.

   (b) The fire brigade member's qualification requirements should include satisfactory completion of a physical examination for performing strenuous activity, and satisfactory completion of the fire brigade training.

   (c) The training provided to fire brigade members should include classroom instruction in the following:

      (1) Identification of the fire hazards and associated types of fires that could occur in the plant, and an identification of the location of such hazards.

      (2) Identification of the location of fire fighting equipment for each fire area, and familiarization with layout of the plant including access and egress routes for each area.

      (3) The proper use of available fire fighting equipment, and the correct method of fighting each type of fire. The types of fires covered should include electrical fires, fires in cables and cable trays, hydrogen fires, flammable liquid and waste/debris fires.

      (4) Indoctrination in the plant fire fighting plan with specific coverage of each individual's responsibilities.

      (5) The proper use of communication, lighting, ventilation, and emergency breathing equipment, in a fire situation.

      (6) The direction and coordination of the fire fighting activities (fire brigade leaders only).

(7) The toxic characteristics of potential products of combustion.

(8) The proper method for fighting fires inside buildings and tunnels.

(9) Detailed review of fire fighting procedures and procedure changes.

(10) Review of latest plant modifications and changes in fire fighting plans (since the last instruction period).

(d) Regular planned meetings held every 3 months should repeat the classroom instruction program over a two year period.

(e) Practice sessions should be held for fire brigade members on the proper method of fighting the various types of fires which could occur in a nuclear power plant. These sessions should provide brigade members with experience in actual fire extinguishment and the use of emergency breathing apparatus under strenuous conditions. These practice sessions should be provided at regular intervals but not to exceed 1 year for each fire brigade member.

(f) The comparison to BTP 9.5-1 states that drills should simulate fires and various fire conditions that would be anticipated in a fire emergency. In addition, fire drills should include the following:

(1) Assessment of fire alarm effectiveness, time required to notify and assemble the fire brigade. and selection, placement and use of equipment.

(2) Assessment of each brigade member's knowledge of his role in the fire fighting strategy for the area assumed to contain the fire; and assessment of the brigade member's conformance with established plant fire fighting procedures and use of fire fighting equipment, including self-contained emergency breathing apparatus, communication equipment, and ventilation equipment, to the extent practicable.

(3) Assessment of the brigade leader's direction of the fire fighting effort, as to the thoroughness, accuracy, and effectiveness.

(4) Performance of drills at regular intervals, but not to exceed 3 months for each fire brigade. At least one drill per year should be performed on a "back shift" for each fire brigade. A sufficient number

of these drills, not less than one for each fire brigade per year, shall be unannounced, to determine the fire readiness of the plant fire brigade leader, brigade, fire protection systems and equipment.

(5) Preplanning of the drills to establish the training objectives of the drill. The drills should also be critiqued to determine how well the training objectives have been met. Unannounced drills should have their critiques performed by members of the management staff responsible for plant safety and security. At three year intervals, drills should be critiqued by qualified individuals independent of the plant staff.

(g) The comparison indicates that a permit system is used for all welding and burning operations, but does not identify who must authorize the permit. All welding and burning work permits should be authorized by the responsible foreman or supervisor. The foreman or supervisor should have received training in potential fire hazards and precautions that should be taken. Before issuing the permit, the responsible foreman or supervisor should physically survey the area where the work is to be performed and establish that the following precautions have been accomplished:

(1) All moveable combustible material below and within a 35 foot radius of the cutting, welding, grinding, or open flame work has been removed. (See NFPA 51B)

(2) All immoveable combustible material below and within a 35 foot radius has been thoroughly protected by asbestos curtains, metal guards, or flameproof covers, and fire extinguishers, hose, or other firefighting equipment are provided at the work site. (See NFPA 51B)

(h) Fire notification procedures should be developed, to include the following:

(1) Actions to be taken by the individual discovering the fire, such as, notification of the control room, sounding alarms and actuation of local fire suppression systems.

(2) Actions to be taken by the control room operator upon report of a fire or receipt of alarm on control room annunciator panel, such as: announcing location of fire over PA system, sounding fire alarms and notifying the shift supervisor and the fire brigade leader of the type, size, and location of the fire.

(3) Actions to be taken by the fire brigade after notification by the control room operator of a fire, including: location to assemble; directions given by fire brigade leader; and

responsibilities of brigade members such as selection of fire fighting equipment and transportation to fire location, selection of protective equipment, use of fire suppression systems operating instructions, and use of preplanned strategies for fighting fires in specific areas.

(4) Actions to be taken by Plant Superintendent and his staff, and Security Guards after notification of a fire.

(5) Actions to be taken that will coordinate fire fighting activities with offsite fire departments, including: identification of individual responsible for assessing situation and calling in outside fire department assistance when needed; identification of individual who will direct fire fighting activities when aided by offsite fire fighting assistance. The procedures should also describe the offsite fire department's resources and estimated response time by the offsite fire department to provide assistance to the station.

(i) Provisions should be established for including offsite fire fighting organizations in fire brigade drills at least one per year and for training offsite fire department personnel in basic radiation principles, typical radiation hazards, and precautions to be taken in a fire involving radioactive materials in the plant.

(j) Fire fighting strategies should be developed for fighting fires in all safety related areas and areas which may present a hazard to safety related areas. These strategies should be provided in a format that affords quick reference in a fire situation and that can also be used in the training program. These strategies should include information to assist fire fighting activities, including:

(1) Identification of combustibles in each plant zone covered by the specific fighting strategy.

(2) Fire extinguishants best suited for controlling the fires associated with the combustible loadings in that zone and the nearest location of these extinguishants.

(3) Most favorable direction from which to attack a fire in each area, in view of the ventilation direction and access hallways, stairs and doors. All access and egress routes that involve locked doors should be specifically identified in the strategy with the appropriate precautions and methods for access specified.

(4) Identification of plant equipment that should be managed (i.e., de-energized or cooled) to reduce the hazard potential during a local fire.

(5) Assignment of responsibilities to brigade positions, including command control of the brigade, fire hose laying, applying the extinguishant to the fire, advancing support supplies to the fire scene, communication with the control room, coordination with outside fire departments.

(6) Identification of radiological and toxic hazards in fire zone.

(7) Control of ventilation system operation for fire containment or smoke clearing operations.

(8) Operations (e.g., application of particular extinguishant or de-energizing equipment) requiring control room and shift engineer coordination or authorization.

(k) The validity of the preplanning strategies should be tested by appropriate full-dress drills to check the logic of the strategy, the adequacy of the equipment, personnel understanding, and to uncover unforeseen problems.

(l) The comparison to BTP 9.5-1 does not describe the inspections performed on fire protection systems. Inspections should be performed to include the following:

(1) Inspections of installation, maintenance and modification of fire protection systems; to assure conformance to design and installation requirements.

(2) Inspection of penetration seals and fire retardant coating installations to verify the activity is satisfactorily completed.

(3) Inspections of cable routing to verify conformance with design requirements, following routing of new cabling.

(4) Measures to assure that inspection personnel are independent from the individuals performing the activity being inspected and are knowledgeable in the design and installation requirements for fire protection.

(5) Inspection procedures, instructions, and check lists which provide for:

- Identification of characteristics and activities to be inspected
- Identification of the individuals or groups responsible for performing the inspection operation
- Acceptance and rejection criteria
- A description of the method of inspection

OCT 23 1978

DOCKET NO. 50-286

DISTRIBUTION:
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License Fee File
LFMB R/F (2)

Power Authority of the State of New York
ATTN: Mr. Paul J. Early
10 Columbus Circle
New York, New York 10019

Gentlemen:

Your letter dated August 2, 1978, requested the following and included a check in the amount of $1,200:

1. Extension of the period of interim operation of Indian Point Unit No. 3 (License No. DPR-64) using the installed once-through cooling system, and

2. Exemption from the amendment fee requirements of 10 CFR Part 170, Section 170.11(b)(1) for item 1 above.

From our review of your request in item 2 above, we have determined that no fee is due at this time for review of item 1 above. It is our present understanding that review of item 1 is essentially a legal matter which is being considered separately by the NRC staff. Therefore, the Office of the Controller is concurrently being authorized to refund the Class II amendment fee of $1,200. It will be processed by the Office of the Controller as soon as possible.

This letter responds only to item 2 above.

Sincerely,
Original Signed by
Wm. O. Miller

William O. Miller, Chief
License Fee Management Branch
Office of Administration

CCR
APP 3

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OFFICE	LFMB:ADM	LFMB:ADM	DOR	XXXOELD	OELD	LFMB:ADM
SURNAME	RMDiggs:slc	CJHolloway	ASchwencer	RFonner	SLewis	WOMiller
DATE	10/17/78	10/ /78	10/ /78	10/ /78	10/20/78	10/ /78

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