John D. O'Toole
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, NY 10003
Telephone (212) 460-2533

November 2, 1984

Re: Indian Point Unit No. 2
Docket No. 50-247

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

The purpose of this letter is to apprise you of the upgrading of the fire barriers at Indian Point Unit 2. The upgrading is being conducted in accordance with our submittal of September 9, 1983 and 10 CFR 50, Appendix R. This upgrading was approved in your letter of October 16, 1984.

In our submittal of September 9, 1983 we stated that we would evaluate and repair the fire barrier penetration seals in accordance with the fire protection review done per the technical requirements of 10 CFR 50, Appendix R. This effort has led us to upgrade and repair the Type I fire barrier penetration seals identified in Enclosure 4 to the September 9, 1983 submittal. Also, we are sealing the internal space within conduits that pass through fire rated barriers. Although no specific NRC fire protection requirement (either Appendix R or Appendix A to BTP 9.5-1) is applicable to Indian Point 2 with regard to sealing within the internal portion of a conduit, we have injected 12 inches of silicone foam into those conduits that pass through a Type I fire barrier. Since almost all conduits passing through a fire barrier are not accessible directly at the barrier, we injected the foam into the internal space of a conduit at the closest accessible opening to the barrier and only on one side of the barrier. Silicone foam sealing around the conduit penetration has been performed at the barrier. Sealing of conduit internal space directly at the barrier would require significant reworking of conduit which we have determined not to be warranted or justified.

In addition, our review of fire barriers has shown that certain fire doors, as installed, cannot carry the appropriate UL label due to modifications made to the doors for security or physical plant

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requirements. These are discussed below. Fire dampers were also covered in the fire barrier review and a separate report (LER 84-013) has been filed with NRC Document Control headquarters, which covers this matter.

The west control room wall is a Type I fire barrier (3-hour), as described in Enclosure 4 to our September 9, 1983 submittal. There are two doors in the west wall requiring a 3-hour fire rating. The single-leaf door to the Central Alarm Station (see Figure 2-1 of our September 9, 1983 submittal), although not carrying a UL label, is a 3-hour rated fire door modified for security purposes according to the manufacturer's documentation. However, according to UL, the door cannot be labeled due to the security modifications. We have determined that this door is adequate with respect to Branch Technical Position 9.5-1 and our September 9, 1983 submittal. The double-leaf door to the Central Control Room is a security door of a bullet-proof construction with other modifications made to it for security purposes. Although of substantial construction, according to UL, it is sufficiently different that it cannot be considered a 3-hour rated door nor can it carry a UL label. As such, Con Edison is installing a properly rated and labeled double-leaf fire door in series with the bullet-proof door, shown on the attached drawing. We expect to complete this work by March 31, 1985. Because the control room security door is of substantial construction, and the Senior Watch Supervisor's office and Central Alarm Station are adjacent to it and since the control room is continuously manned, we do not consider additional compensatory measures to be warranted in the interim period that it takes to procure and install the fire door.

We have installed a 1 1/2-hour rated fire door in the doorway in the common wall between RHR 21 pump room (Zone 4) and the Valve Room and Corridor (Zones 13A, 18A and 3A) in accordance with our September 9, 1983 submittal. However, due to physical plant interferences the door frame (wall opening end cap) had to be modified and, according to the door manufacturer, the frame cannot be labeled even though it is constructed to the UL requirements. To provide added fire protection in light of the modification to the door frame, the space between the frame end cap and the wall opening has been filled with silicone foam. We have determined that this installation is sufficient to meet our September 9, 1983 commitment.

As part of our continuing evaluation of the fire doors at Indian Point 2, the non-rated door between the Transformer Yard and Primary Auxiliary Building (PAB) at Elev. 15ft. will be replaced with a 3-hour fire rated door. The existing fire rated door in the Switchgear Room west wall will be replaced with a new 3-hour fire rated door because of modifications made to the doorway and other damages on the door. Both of these fire door installations are being made for consistency with our April, 1977 evaluation of Appendix A to BTP 9.5-1. These fire doors will be installed by March 31, 1985. Also, replacement fire rated door hardware (e.g., lock set, door strike, etc.) for the Cable Spreading Room Elev. 33 ft. fire door, Switchgear Room Elev. 15 ft. Southeast fire door, and the Switchgear Room/Transformer Yard Elev. 15 feet fire door will be installed by March 31, 1985.

Additionally, the fire barrier review included an evaluation of exposed structural steel in accordance with the guidance of Generic Letter 83-33 and that set forth at the related NRC regional workshop. As such, we have determined that some exposed structural steel in certain fire areas/zones needs to be fire protected. We are in the process of developing the scope of work and related modification package and anticipate completing the necessary repairs by March 31, 1985. Much of the NRC guidance related to fire protecting exposed structural steel was issued in the early part of 1984 and there was insufficient time to fully evaluate its impact on our September 9, 1983 submittal and related plant modifications for 10 CFR 50 Appendix R. Unless your staff indicates otherwise, we do not believe a formal schedule exemption is necessary to make these repairs to the exposed structural steel. Generic Letter 83-33 is still under review by Con Edison.

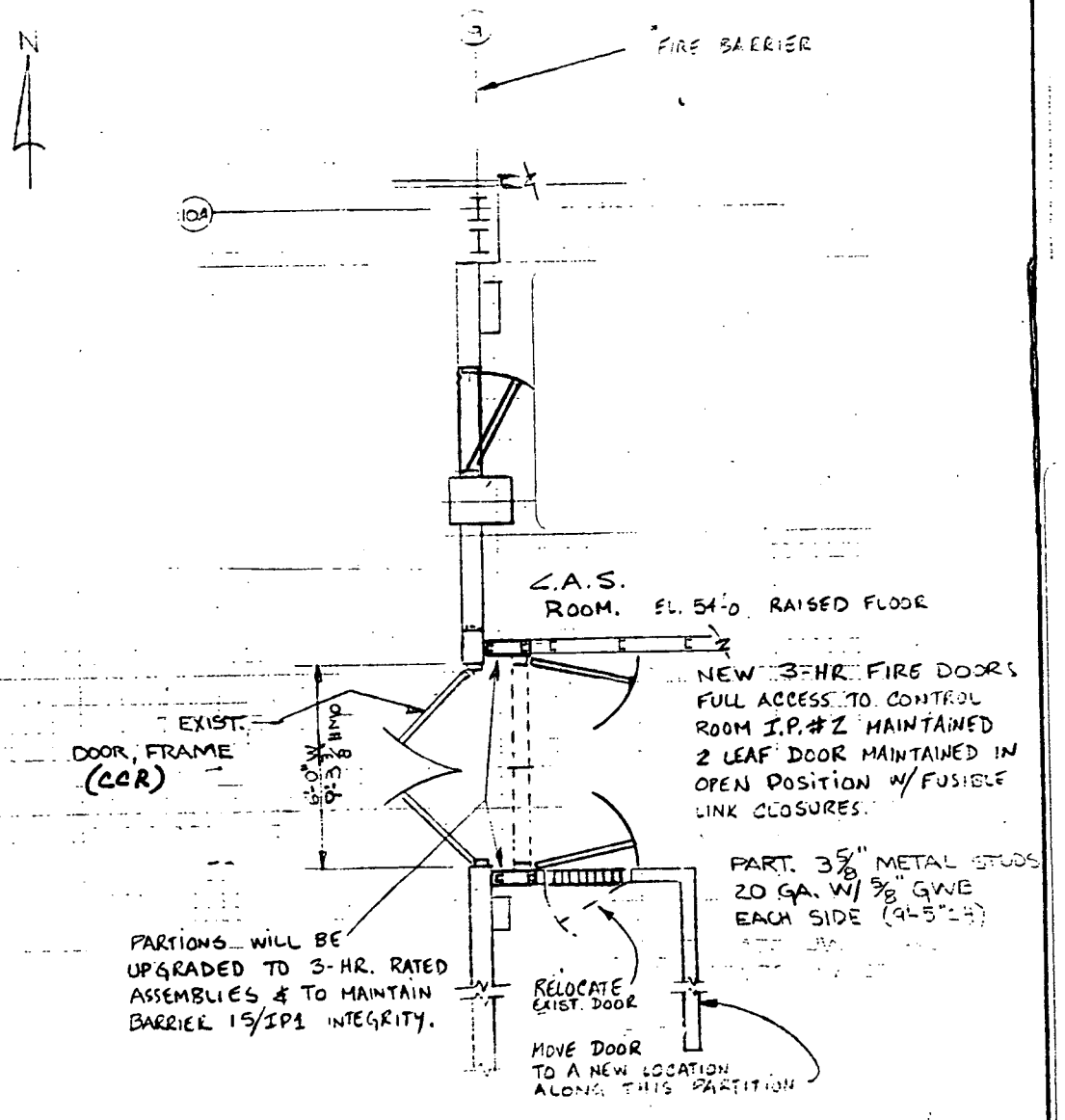
If you have any questions on these matters, do not hesitate to call on us.

Very truly yours,

Richard P. Remshaw

John D. O'Toole
Vice President

cc: Office of Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511



SKETCH 1

PLAN VIEW OF FIRE ZONE INTERFACE 15/IP1

WEST WALL OF CCR