

John D. O'Toole  
Vice President

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August 8, 1985

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

Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Dear Mr. Varga:

The purpose of this letter is to clarify and document the status of a previous Con Edison commitment relative to the installation of fire detection in the New Fuel Area in the Fuel Storage Building at Indian Point 2. The discussion below indicates why Con Edison believes this clarification is necessary and provides justification for the current situation at Indian Point 2.

Background

A document entitled, "The Review of the Indian Point Fire Protection Program" (IPFPP), Rev. 1, was submitted to the NRC on April 15, 1977 in response to Appendix A of Branch Technical Position (BTP) 9.5-1. Paragraph 8.84 of the IPFPP indicated that detection would be installed in the New Fuel Area. Subsequently, a letter dated May 26, 1978 was transmitted to the NRC in response to correspondence from the NRC dated April 20, 1978 requesting additional information on the IPFPP. Enclosure 2 of the May 26, 1978 Con Edison letter contains the results of a study of fire detection coverage at IP-2 performed subsequent to the submittal of the IPFPP. The results list approximately 33 detectors to be added in various locations containing safety related equipment.

Although it was not stated explicitly in the May 26, 1978 letter, it was intended for this list of proposed detection modifications to replace those in the IPFPP. Therefore, this letter superseded the commitment to install detection in the New Fuel Area.

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The Fire Protection Safety Evaluation Report (SER) for Indian Point 2 issued by the NRC on January 31, 1979 provides a summary of modifications in Section 3.0. Section 3.1.5 specifically deals with fire detection. This section references the May 26 and the September 18, 1978 letters as the applicable licensee submittals with regard to fire detection. (The September 18, 1978 letter dealt with detection power supply and reactor coolant pump detection). Therefore, it is apparent that the NRC recognized that the previous commitment regarding detection in the New Fuel Area from the IPFPP was superseded by the May 26, 1978 letter.

#### Technical Evaluation

An evaluation of the New Fuel Area, as well as the entire Fuel Storage Building, has shown that installation of fire detection will not enhance the level of fire protection in the area. The combustible loading in the area is approximately 520 BTU/sq. ft, which, using the standard NFPA definition, is low. In fact, the range for low combustible loading is from 0 BTU/sq. ft. up to 100,000 BTU/sq. ft., which means that the 520 BTU/sq. ft. loading is extremely low. The only combustibles are a limited amount of transient combustibles (such as anticontamination clothes at step off pads) and plastic (fire retardant) protective covers over the new fuel.

No equipment or cables in the Fuel Storage Building are required for safe shutdown. Therefore, more current regulations, such as Appendix R to 10 CFR Part 50, do not require detection to be installed over the new fuel or spent fuel pool areas.

There are other nuclear plants that do not have general area fire detection over the new fuel or spent fuel areas. Therefore, Con Edison is following an established precedent.

In any event the high ceiling of the Fuel Storage Building makes installing, testing, and servicing detectors very difficult; and these operations could also inadvertently result in accidental damage to new fuel assemblies, debris in the spent fuel pool or other undesirable consequences if something were dropped while working on the detectors.

In view of the above, Con Edison has no plans for the installation of detection over the New Fuel Area. Should you or your staff have any questions, or need further information please contact us.

Very truly yours,



John D. O'Toole  
Vice President

cc: Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
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