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February 6, 1995

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Proposed Technical Specifications Amendment to Revise
Fire Protection Requirements (TAC No. M89828), Revised
License Condition 2.K

By letter dated June 16, 1994, we transmitted an "Application for Amendment to the Operating License" to amend the Indian Point Unit No. 2 Technical Specifications and to change license condition 2.K. After initial review, the NRC Staff subsequently requested that the proposed license condition 2.K. be revised to include the dates of fire protection related NRC Safety Evaluation Reports (SERs).

Attachment A to this letter contains proposed license condition 2.K revised to include applicable NRC SERs. Attachment B contains a listing of fire protection and Appendix R SERs issued for Indian Point Unit No. 2. This listing identifies the SERs included in proposed license condition 2.K and indicates the portions of each of those SERs that are no longer applicable due to licensee submittals, licensee evaluations, subsequent SERs, or the proposed Technical Specification Amendment. This listing also provides the reasons for not including certain SERs in the license condition. It is our understanding that the date of the SER that approves this proposed amendment will also be included in license condition 2.K.

The June 16, 1994 Application, the proposed Technical Specifications changes provided in its Attachment A, and the Safety Assessment provided in Attachment C are unaffected by the revised license condition 2.K contained herein.

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Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing.

Very truly yours,



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ATTACHMENT A
PROPOSED LICENSE CONDITION 2.K - REVISED

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
FEBRUARY, 1995

2.K. Consolidated Edison Company of New York, Inc. shall implement and maintain in effect all provisions of the NRC-approved fire protection program as described in the Updated Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Reports dated November 30, 1977, February 3, 1978, January 31, 1979, October 31, 1980, August 22, 1983, March 30, 1984, October 16, 1984, September 16, 1985, November 13, 1985, March 4, 1987, January 12, 1989, and . The licensee may make changes to the NRC-approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

ATTACHMENT B
FIRE PROTECTION AND APPENDIX R
SAFETY EVALUATION REPORTS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 2
DOCKET NO. 50-247
FEBRUARY, 1995

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

November 30, 1977*

Amendment 36 to Technical Specifications establishing fire protection requirements in sections 3.13.A, .B, .C, .D, Table 3.13-1, 4.14.A, .B, .C, .D, 6.2.2.f, 6.4.2, 6.5.2.8.h, 6.9.2.d

Section 6.5.2.8.h was revised in Amendment 37 and remains as revised there. Section 6.9.2.d was changed to 6.9.2.b in Amendment 94 and is deleted by the June 16, 1994 Application. All other sections are deleted by the June 16, 1994 Application.

February 3, 1978*

Amendment 37 to Technical Specifications involving sections 6.5.2.8.h, i, j

These sections remain unaffected by the June 16, 1994 Application.

January 31, 1979*

Amendment 46 to Technical Specifications involving sections 3.13.E.1.e, f, 4.14.E.1.a, b, c, d, e and Fire Protection SER.

All sections are deleted by the June 16, 1994 Application.

Regarding submittals reviewed by the NRC for this SER, subsequent plant modifications, program changes, later reviews, and commitments have caused much of the material in the original comparison to BTP 9.5-1 to become obsolete or incorrect. An updated comparison to BTP 9.5-1 was prepared and is included in Appendix A to the Fire Protection Program Plan (FPPP). Also, the fire hazards analysis (FHA) for each fire zone was updated in 1985 to include, among other things, combustible loading due to cable insulation, and have been regularly updated to reflect plant modifications as recommended by Section 8.1 of Generic Letter 86-10, "Implementation of Fire Protection Requirements". The updated FHAs are included in the FPPP. The FPPP was initially submitted (Revision 3) to the NRC on October 13, 1987, and periodic revisions have been submitted to the NRC as holders of controlled copies.

Regarding the SER:

Section 3.1, Modifications, page 3-1, fifth paragraph refers to proposed technical specifications to be submitted for roof protection, water supply, cable spreading room protection, fire

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

detectors, and containment hose stations. These technical specifications are deleted by the June 16, 1994 Application.

Section 3.1.15, page 3-4, discussion of additional fire detectors to be provided was the subject of an August 8, 1985 submittal which clarified that the May 26, 1978 submittal referred to in this SER deleted the need to install fire detectors in the New Fuel Area as well as the entire Fuel Storage Building. The August 8, 1985 submittal was not acknowledged.

Section 3.1.25, page 3-7, item 12, design of cable penetration fire stops in critical fire barriers has been superseded by requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs.

Section 4.1, page 4-1, discussion of safe shutdown equipment utilized during or subsequent to a fire has been superseded by later Appendix R submittals and SERs.

Section 4.9.3, page 4-9, description of design of electrical cable penetration seals in fire barriers has been superseded by requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs.

Section 4.10, page 4-9, description of separation criteria as related to loss of redundant shutdown equipment by fire has been superseded by the separation requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs. Also, the last paragraph on page 4-10 and the first paragraph on page 4-11 refer to an alternate shutdown system that has been superseded by later Appendix R submittals and SERs.

Section 4.11, Fire Barriers, page 4-11, first and third paragraphs, have been superseded by requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs.

Section 5.0, Evaluation of Specific Plant Areas, has a qualitative discussion of combustibles in each plant area which may have changed since that time. The fire hazards analysis (FHA) for each fire zone was updated in 1985 to include, among other things, combustible loading due to cable insulation, and have been regularly updated to reflect plant modifications as recommended

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

by Section 8.1 of Generic Letter 86-10, "Implementation of Fire Protection Requirements". The updated FHAs are included in the FPPP. The FPPP was initially submitted (Revision 3) to the NRC on October 13, 1987, and periodic revisions have been submitted to the NRC as holders of controlled copies.

Section 5.1.3, page 5-1, discussion of fire damage to residual heat removal pumps has been superseded by later Appendix R submittals and SERs and a recent plant modification.

Section 5.2.3, page 5-2, discussion of fire damage to component cooling water and safety injection pump cables has been superseded by later Appendix R submittals and SERs.

Sections 5.11.1 and 5.11.3, page 5-11, discussion of use of diesel generator for safe shutdown in the event of loss of offsite power concurrent with a fire has been superseded by later Appendix R submittals and SERs.

Section 5.15.4, page 5-16, refers to automatic water spray system for transformers which is correct for the main transformers once the unit trips off the line.

Section 6.0, Administrative Controls, page 6-1, refers to the fire protection administrative controls as provided in the Revision 1 comparison to BTP 9.5-1 submitted April 15, 1977 as supplemented by letter dated October 31, 1978. The controls have changed since those submittals and may no longer be exactly as described therein. Subsequent NRC inspections have reviewed the fire protection administrative controls.

Section 7.0, Technical Specifications, page 7-1, is no longer applicable due to the June 16, 1994 Application.

Section 8.0, Conclusions, page 8-2, fifth paragraph, last sentence refers to issuance of technical specifications for fire protection systems which are deleted by the June 16, 1994 Application.

September 18, 1979

Amendment 59 to Technical Specifications correcting Table 3.13-1.

Table is deleted by the June 16, 1994 Application.

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

January 28, 1980

Amendment 60 to Technical Specifications involving sections 3.13.F, Table 3.13-1, 4.14.D.1.a, 4.14.F.

All are deleted by the June 16, 1994 Application.

October 31, 1980*

Amendment 64 to Technical Specifications involving sections 3.13.A.1.a, b, 3.13.A.2, 3.13.A.3.b, c, 3.13.B.2.b, 3.13.C, 3.13.D.2, 3.13.E, 3.13.F, Table 3.13-1, Table 3.13-2, 4.14.A, 4.14.D, 4.14.E, 4.14.F, 6.2.2.f and correction pages to January 31, 1979 SER.

All technical specification sections are deleted by the June 16, 1994 Application.

As in the January 31, 1979 SER, section 3.1.25, page 3-7, item 12, design of cable penetration fire stops in critical fire barriers has been superseded by requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs.

As in the January 31, 1979 SER, section 4.10, page 4-9, description of separation criteria as related to loss of redundant shutdown equipment by fire has been superseded by the separation requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs. Also, the last paragraph on page 4-10 and the first paragraph on page 4-11 discuss an alternate shutdown system that has been superseded by later Appendix R submittals and SERs.

As in the January 31, 1979 SER, Section 4.11, Fire Barriers, page 4-11, first and third paragraphs, have been superseded by requirements of Appendix R and compliance is as documented in later Appendix R submittals and SERs.

August 24, 1981

Amendment 72 to Technical Specifications establishing license condition 2.K.

License condition 2.K is revised by the June 16, 1994 Application.

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

August 22, 1983*

"Safety Evaluation Report - Appendix R to 10 CFR Part 50, Items III.G and III.L - Indian Point 2"

Section 3.4.2, Common Enclosure, pages 10-11, discusses a manhole that contains normal and alternate power feeds for the service water pumps. A plant modification which received a 10CFR50.59 review subsequently separated the power feeds and a May 25, 1989 submittal deleted the need for the exemption for Manhole 21. A revision to this SER was not issued and may not be necessary since the modification brought the plant configuration into compliance with Appendix R.

March 30, 1984*

"Indian Point 2 - Supplemental Safety Evaluation (SSE) for Appendix R to 10 CFR 50, Sections III.G and III.L"

Unaffected by the June 16, 1994 Application.

October 16, 1984*

"Technical Exemption from the Requirements of 10 CFR 50, Appendix R, for the Indian Point Nuclear Generating Plant, Unit No. 2 (IP-2)"

Notice of Exemption, Section 1.0, Technical Exemptions, page 5, item 5 granted an exemption for Yard Manhole 21. The need for the exemption was deleted by the May 25, 1989 submittal. A revision to this SER was not issued and may not be necessary since the modification brought the plant configuration into compliance with Appendix R.

Combustible loading values in Exemption Sections 1.2.2.1, 1.2.2.2, 1.3.2, 1.4.2, 1.6.2, 1.7.2.2, 1.8.2, 1.9.2, and 1.11.2 were from the original FHAs. These were updated in 1985 to include, among other things, combustible loading due to cable insulation. Each exemption request provided a qualitative description of the amount of cable insulation in each zone in describing combustibles as part of the exemption request justification. Additionally, the exemption requests generally used a conservative quantity of transient combustible combustible in addition to the in-situ combustibles such as cable insulation. Further, the January 10, 1983 submittal requesting the exemptions included a discussion (section 5.0) of the fire retardant properties of the cable used at Indian Point 2.

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

Exemption, Section 1.10.2, page 29, third and fourth paragraphs, and page 30, fourth paragraph, refer to continuously manned guard house at the intake structure. A September 9, 1983 submittal provided justification for not relying on the presence of security guards, but the SER still contained the reference. Further, a May 23, 1985 submittal requested NRC concurrence and issuance of a revision to the SER which would delete the continuous manning requirement. The SER has not yet been revised or supplemented.

Note: the May 23, 1985 submittal also requested the NRC to acknowledge that clarifying information regarding: exemption 4.12 of the January 10, 1983 submittal; the design of the installed source range monitor, hot and cold leg temperature instrumentation; and the seismic basis of the assessment of the RCP motor lube oil system are within the scope of the approved exemptions or provide an acceptable Appendix R configuration, or to revise or supplement existing NRC approvals. The submittal stated the belief that the clarifying information did not change the NRC conclusions in prior approvals. A July 11, 1986 NRC letter addressed other issues raised in the May 23, 1985 submittal, but not the clarifying information, and the SER has not been revised or supplemented.

Exemption, Section 1.12.0, page 33, and Exemption, Section 1.15.0, page 38, item 5, address Yard Manhole 21 exemption, the need for which was deleted by the May 25, 1989 submittal. A revision to this SER was not issued and may not be necessary since the modification brought the plant configuration into compliance with Appendix R.

Note: A November 11, 1984 submittal apprised NRC of fire barrier upgrading that was identified in Enclosure 4 of a September 9, 1985 submittal and several fire door installations were justified not to be UL rated. This SER has not been revised or supplemented to incorporate this submittal.

April 22, 1985

Amendment 94 to Technical Specifications involving sections 3.13.A.2, A.3.b, B.2.b, C.2.b, D.2.c, E.2.b, F.2.b to incorporate 10CFR50.72 and 10CFR50.73.

All sections are deleted by the June 16, 1994 Application.

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

September 16, 1985* "Appendix R Requirements for Control Room Penetration Seals for the Indian Point Nuclear Generating Unit No. 2"

Page 2 refers to automatic fire detection and suppression system for the cable spreading room. The Halon suppression system is manually actuated. A February 20, 1985 submittal, which was reviewed for this SER, stated that it was a manual system.

November 13, 1985* "Technical Exemption from the Requirements of 10 CFR 50 Appendix R for the Indian Point Nuclear Generating Unit No. 2"

Unaffected by the June 16, 1994 Application.

Although it refers to a May 23, 1985 submittal, this SER does not specifically address the use of hand held lighting inside containment as requested in the May 23, 1985 submittal.

March 4, 1987* "Technical Exemption from the Requirements of 10CFR 50 Appendix R for the Indian Point Nuclear Generating Unit 2"

Unaffected by the June 16, 1994 Application.

January 12, 1989* "Evaluation of Fire Protection Features at Indian Point Nuclear Generating Unit No. 2 (TAC 66065)"

The cover letter for the SER addressed the acceptability of RHR Pump 22 cable protection with a 3-hour barrier. This barrier has been deleted by a recent modification which received a 10CFR50.59 review.

The SER did not address the auxiliary feedwater pump partial separation barrier as requested in a September 11, 1985 submittal.

The SER did not include the low probability of multiple spurious valve failures in the basis for closure of post-fire re-entry requirements for the auxiliary feedwater pump room and the piping penetration area, as justified in a September 14, 1988 submittal.

FIRE PROTECTION & APPENDIX R
SAFETY EVALUATION REPORTS

February 6, 1989

Amendment 136 corrected Table 3.13-2.

Table is deleted by the June 16, 1994 Application.

* Included in License Condition 2.K