POWER AUTHORITY OF THE STATE OF NEW YORK INDIAN POINT NO. 3 NUCLEAR POWER PLANT

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June 9, 1980 IP-LMK-8876

Mr. Boyce B. Grier, Director Office of Inspection and Enforcement Region I U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pa. 19406

> Subject: Indian Point No. 3 Nuclear Power Plant Docket No. 50-286 I.E. Bulletin 80-12

Dear Sir:

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In response to IE Bulletin 80-12 Item 7, Indian Point No. 3 procedures and equipment capabilities have been reviewed and analyzed and were found to be adequate and reliable during the various modes of operation. In the cold shutdown and refueling modes, normal DHR capability is provided by the Residual Heat Removal System which consists of redundant pumps and redundant heat exchangers. The residual heat removal heat exchangers are in turn serviced by the component cooling system which involves redundant pumps and heat exchangers and the cooling for the component cooling heat exchangers is provided by redundant pumps in the Service Water System.

When reactor coolant temperature is above the design conditions of the Residual Heat Removal System, DHR capability is normally provided by the steam generators utilizing redundant auxiliary feed water pumps supplied from the condensate storage tank.

In the unlikely event of loss of the normal DHR equipment described above, DHR capability can be provided as described below:

1 - Cold shutdown and refueling modes:

a - Reactor Coolant System Closed

DHR capability is provided by the steam generators with the Auxiliary Feed Water System or by manipulating the RCS System Level with Safety Injection or Charging Pumps.

b - Reactor Vessel Head Removed

DHR capability is provided by filling the reactor cavity (if not already filled) from the refueling water storage tank (RWST) using the redundant containment spray pumps or the redundant safety injection pumps or the redundant charging pumps. Cooling may then be established by the containment fan cooler units and/or by the transfer of reactor cavity borated water to the recirculation sump and utilizing a redundant recirculation pump to transfer this borated water via either residual heat exchanger to the RCS.

- Reactor Coolant System Open But Vessel Head In Place

DHR capability is provided by filling the RCS sufficiently, using borated makeup water, to establish a flow path from the RCS opening to the recirculation sump. One of the two redundant recirculation pumps are then used to transfer this borated water via either residual heat exchanger to the RCS. In this mode, heat removal from the recirculated water can be accomplished using either the residual heat exchangers or the containment fan cooler units.

- Reactor Coolant temperature above Residual Heat Removal System design conditions.

DHR capability is maintained by the redundant auxiliary feed water pumps.

In the event of loss of the Condensate Storage Tank a backup water supply is provided by the city water storage tank to maintain DHR capability.

Indian Point No. 3 has not encountered any events similar to the Davis-Besse incident and has not experienced any such degradation of the Decay Heat Removal System. Current procedures require the defeating of automatic ECCS actuation as a requisite for entering cold shutdown or refueling modes thereby precluding the occurrence of an event similar to the one addressed in this bulletin. Existing procedures address potential loss of the normal means of decay heat removal and provide for adequate alternate means of decay heat removal under the various modes, postulations and conditions.

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To provide an added assurance against loss of Decay Heat Removal capability during cold shutdown or refueling modes, Indian Point No. 3 will implement the following within 30 days.

- 1 An alternate Decay Heat Removal means be available prior to reducing the required redundancy of the normal Residual Heat Removal System.
- 2 An alternate Decay Heat Removal means be made available as soon as possible following failure of a component that reduces the required redundancy of the normal Residual Heat Removal System.

Respectfully,

Zulla

Resident Manager

LMK/jd

cc: Office of Inspection and Enforcement Division of Reactor Operations Inspection U.S. Nuclear Regulatory Commission Washington, D. C. 20555

STATE OF NEW YORK) COUNTY OF WESTCHESTER) ss.:

On this 9th day of June, 1980, personally appeared before me S. S. Zulla, known to me as the person who executed the above document.

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RUTHANNE B. BOWMAN Notary Public, State of New York No. 4651904, Westchester County Commission Expires March 30, 1981