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New York Power Authority

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U.S. Nuclear Regulatory Commission
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Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Central Control Room Heating Ventilation Air Conditioning - Clarification of the Authority's Response

Reference: NYPA letter, J.R. Schmieder to the NRC, "Containment Isolation System," dated March 6, 1980 (IPN-80-27).

Dear Sir:

Licensee Event Report 94-006, Revision 1, concerning a single electrical failure in the control room ventilation isolation system, committed to clarifying a 1980 letter regarding the control room ventilation isolation system. This letter fulfills that commitment by clarifying the Authority's affirmative response to NRC Question 3 of the referenced letter which asked "Is the control room ventilation isolation system an ESF system?"

The Central Control Room Heating Ventilation and Air Conditioning (CCR HVAC) system, as initially designed, was not considered a safety related system. The design followed standard industrial heating and ventilation practices and American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) guidelines at the time of the Indian Point 3 plant design. During the detailed design and licensing phase, the CCR HVAC system design was classified as safety related and upgraded by providing cooling water from the nuclear portion of the Service Water system, power from the Emergency Diesel Generators, and two 100 percent capacity charcoal booster fans. Additionally, the control room ventilation isolation section of the CCR HVAC was upgraded such that, upon receipt of a safety injection signal or a high radiation signal, a 10% incident mode is *automatically* initiated.

The term Engineered Safety Feature is discussed in the Indian Point 3 Final Safety Analysis Report (FSAR) in terms of performance capabilities such as being able to accommodate the failure of any single active component. Engineered Safety Feature (ESF) Systems that meet the performance capabilities associated with an Engineered Safety Feature are identified in the FSAR. The control room ventilation system is not listed as an ESF system. The ventilation isolation section of the control room ventilation system that operates in the incident or recirculation mode is required by Technical Specification 3.3.H to be operable when containment integrity is required.

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Therefore, the extent to which the control room ventilation system is considered an Engineered Safety Feature is in the use of an engineered safety feature signal to initiate the 10% incident mode automatically.

As described in the September 21, 1973 Safety Evaluation Report, the CCR HVAC system was similar to those of other previously licensed reactor plants of this type. The NRC staff concluded that the system was acceptable. Although the design of the system as licensed is acceptable, the Authority is in the process of implementing design changes prior to startup to refurbish current CCR HVAC operation and reliability.

This letter contains no new commitments. If you have any questions please contact Ms. C. Faison.

Very truly yours,

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