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William J. Cahill, Jr.  
Chief Nuclear Officer

March 28, 1995  
IPN-95-039

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
**Updated Information Concerning the Authority's  
10 CFR 50, Appendix R Analysis**

Reference: NYPA letter, L. M. Hill to NRC (IPN-94-115), "Information Concerning NYPA's  
10 CFR 50, Appendix R Analysis," dated September 9, 1994.

Dear Sir:

In the referenced September 9, 1994 letter, the Authority provided information relative to identified concerns with the Indian Point 3 Appendix R analysis. In the course of evaluating the original issues, the Authority identified additional issues in the fire protection area, and has subjected them to the same evaluation process that was developed for the original issues.

The Authority has completed the evaluation of 55 of 58 identified fire protection issues. The remaining three issues have been determined not to be startup related. Attachment I provides more detail regarding the issues, and the process used to evaluate and resolve the issues. Further, a Licensee Event Report is being prepared to address any of these fire protection issues that are reportable.

Attachment II contains the commitments made by the Authority in this submittal. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. Cahill, Jr.', written over a circular stamp.

William J. Cahill, Jr.  
Chief Nuclear Officer

Attachments: as stated  
cc: see next page

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**ATTACHMENT I TO IPN-95-039**

**FIRE PROTECTION ISSUES - UPDATE**

**NEW YORK POWER AUTHORITY  
INDIAN POINT 3 NUCLEAR POWER PLANT  
DOCKET NO. 50-286**

## **Attachment I to IPN-95-039**

### **Fire Protection Issues - Update**

#### **Background**

As noted in the referenced September 9, 1994 letter, the Authority began the pursuit of improvements in the fire protection, 10 CFR 50, Appendix R program for Indian Point 3 as a result of NRC Inspection Report 50-286/93-24. At the time of the letter, four DERs (94-426, 94-427, 94-428, and 94-429) had been written to document and correct the apparent 10 CFR 50, Appendix R discrepancies in the plant.

As discussed in the September 9, 1994 letter, the resolution of these issues was complicated by differing professional opinions regarding the actions needed to comply with the safe shutdown provisions of 10 CFR 50, Appendix R. Therefore, the Authority committed to hire an independent consultant who had experience in fire protection programs for nuclear power plants. The consultant was tasked with reviewing the efforts of the Authority's staff in evaluating the issues, and recommending solutions that would be consistent with industry practices and in compliance with the current interpretation of the 10 CFR 50, Appendix R requirements.

#### **The Authority's Approach to Resolving the Issues**

Following the issuance of the September 9, 1994 letter, additional issues were identified by the fire protection engineering staff, and the differences between the parties involved became more pronounced and impeded the efforts to effectively resolve the issues. On October 6, 1994, the Executive Vice President-Nuclear Generation and Chief Nuclear Officer directed the formation of a Fire Protection Task Force which was to be a multi-disciplined group tasked with reviewing and evaluating the closure process and specific packages for the identified fire protection issues.

The Fire Protection Task Force, which included representatives from design engineering, technical services (system engineering), operations, and licensing, was formed under the direction of a senior manager in design engineering, and was given oversight by two senior management consultants (mentors). Three fire protection consultants (authorities in nuclear power plant fire protection) were hired to work directly with the fire protection engineers and other members of the Task Force. An engineering division standing order (procedure) was issued to define the process that would be used for the resolution of the fire protection issues. Each of the identified issues is being tracked to completion by a tracking system used by the design engineering staff. The Task Force met weekly during the early phases of the program. The frequency of the meetings was decreased as the number of open issues was reduced.

On November 16, 1994, it was discovered that the original design of the emergency lighting system in the Central Control Room (CCR) was not in conformance with the requirements of 10 CFR 50, Appendix R. The condition was determined to be reportable, and LER 94-12 was submitted on January 18, 1994. A modification initiated in 1993 for other reasons, was completed in December, 1994 and eliminated the deficient condition found in the CCR emergency lighting circuit. In addition, a four-hour notification was made to the NRC on

March 20, 1995, to be followed by a 30-day LER.

A total of 58 issues have been evaluated by this process. The Authority has completed the evaluation of 55 of these issues. The remaining three issues have been determined not to be startup related. All evaluations, and the identification of corrective additions, if required, for the startup related issues, are complete. The resolutions include: (1) plant modifications, (2) procedure upgrades, (3) expansion of the scope of previously approved exemptions, and (4) a determination that no action is required.

**ATTACHMENT II TO IPN-95-039**

**COMMITMENT LIST**

**NEW YORK POWER AUTHORITY  
INDIAN POINT 3 NUCLEAR POWER PLANT  
DOCKET NO. 50-286**

**Commitment List**

<b>Commitment Number</b>	<b>Commitment</b>	<b>Due Date</b>
IPN-95-039-01	Prepare and submit an additional LER to address any of the fire protection issues that are reportable.	April 19, 1995