

## **UNITED STATES NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

May 24, 1994

Docket No. 50-286

Mr. William A. Josiger, Acting Executive Vice President - Nuclear Generation Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Dear Mr. Josiger:

REQUEST FOR ADDITIONAL INFORMATION CONCERNING EXEMPTION FROM THE SUBJECT:

REQUIREMENTS OF 10 CFR PART 50, APPENDIX R, SECTION III.G.3 - INDIAN

POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. M88260)

By letter dated November 17, 1993, you submitted a request for an exemption from the requirements of 10 CFR Part 50, Appendix R, Section III.G.3 which specifies requirements to ensure that the alternate shutdown system is independent of shutdown equipment that does not meet the requirements of Section III.G.2 of Appendix R. Section III.G.2 of Appendix R specifies requirements to ensure that one train of redundant equipment necessary to achieve and maintain hot shutdown remains free of fire damage.

During a programmatic review of the Fire Protection Program and Appendix R compliance strategy at Indian Point Nuclear Generating Unit No. 3, it was identified that the alternate shutdown system did not meet the requirements of 10 CFR Part 50, Appendix R, Section III.G.3, since several components in the alternate shutdown system were located in the same fire area as redundant shutdown instrumentation cables. You specifically requested an exemption from Section III.G.3 to allow an operator to enter the fire area to perform manual actions. The operator actions would include repositioning switches at the instrument isolation cabinets which would align instrument indication to the alternate shutdown panels.

The NRC staff has conducted a preliminary review of your November 17, 1993, submittal and determined that additional information is required. Therefore, in order to facilitate our review of your submittal, you are requested to supplement the exemption request, providing the following:

Please provide the results of analyses performed to justify why the smoke generated in the fire area will not inhibit the operator from entering the fire area and performing the manual actions needed to mitigate this fire scenario. Please include the assumptions used in these analyses.

nrg file center copy

May 24, 1994

Mr. Williams A. Josiger

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Please provide this information within 60 days of receipt of this letter. Should you have any questions on this matter please contact me at (301) 504-1421.

The response requested by this letter affects one respondent and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,

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Nicola F. Conicella, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

cc: See next page

Mr. William A. Josiger, Acting Power Authority of the State of New York

cc:

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Mr. Gerald C. Goldstein Assistant General Counsel Power Authority of the State of New York 1633 Broadway New York, New York 10019

Mr. Robert G. Schoenberger First Executive Vice President and Chief Operating Officer Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Mr. Leslie M. Hill Resident Manager Indian Point 3 Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511

Mr. Peter Kokolakis
Director Nuclear Licensing - PWR
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123 Main Street
White Plains, New York 10601

Ms. Donna Ross New York State Energy Office 2 Empire State Plaza 16th Floor Albany, New York 12223

Charles Donaldson, Esquire Assistant Attorney General New York Department of Law 120 Broadway New York, New York 10271 Indian Point Nuclear Generating Station Unit No. 3

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Mr. Richard L. Patch, Acting Vice President - Appraisal and Compliance Services Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Union of Concerned Scientists Attn: Mr. Robert D. Pollard 1616 P Street, NW, Suite 310 Washington, DC 20036 - 2 -

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Sincerely,

Original signed by:

Nicola F. Conicella, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

cc: See next page

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