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New York Power Authority

L. M. Hill
Site Executive Officer

December 29, 1995
IPN-95-131

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

SUBJECT: **Indian Point 3 Nuclear Power Plant**
Docket No. 50-286
Fire Protection Hose Stations

References: 1. NRC letter to NYPA, dated March 6, 1979 enclosing Fire Protection Safety Evaluation Report (Amendment 24).

2. NRC letter to NYPA, dated May 2, 1980, enclosing Supplement to the Fire Protection Safety Evaluation Report.

Dear Sir:

This letter informs the Nuclear Regulatory Commission (NRC) of certain discrepancies identified during the Fire Protection Design Basis Documentation (DBD) Consolidation process. This letter satisfies the special reporting requirement of Indian Point 3 (IP3) Operational Specification 3.5.5.

The first discrepancy concerns fire hose stations that were not identified in the IP3 Operational Specifications. During the Fire Protection DBD review, the Authority noted that certain fire hose stations that were installed as committed by the Authority for compliance with the requirements of Appendix A of Branch Technical Position (BTP) 9.5-1, "Fire Protection for Nuclear Power Plants," were not identified in Indian Point 3 Operational Specification Table 3.5.5-1. This specification was established to provide operability and surveillance requirements for fire protection and detection systems that protect equipment utilized for safe shutdown of the plant. The fire protection systems installed at Indian Point 3 comply with the requirements of BTP 9.5-1 as evaluated by the NRC in Amendment 24 (References 1 and 2). The second discrepancy concerns incorrectly identified fire hose stations. Three (3) fire hose stations on elevations 15', 36'-9", and 53' of the Turbine Building at the location of the Control Building entrance were incorrectly identified as 3 hose stations in the Control Building in surveillance procedure 3PT-M91, "Fire Protection Flow Path Verification." This discrepancy resulted in a missed monthly surveillance for the 3 fire hose stations in the Turbine Building at the Control Building entrance and 3 alternate hose stations were surveilled instead for several months.

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As part of its compliance with the BTP 9.5-1 Appendix A, the Authority committed to install fire hose stations in the Primary Auxiliary Building, Control Building, Auxiliary Feed Pump Building, Fuel Storage Building, Fan House, Waste Hold-Up Tank Area, Containment and Intake Structure (References 1 and 2). In addition, as requested in Reference 1, the Technical Specifications were to be modified to include Limiting Conditions for Operation and Surveillance requirements as a result of these installations. Of those fire hose stations installed, 19 stations were never included in the Fire Protection Technical Specifications. The Authority has not determined why the hose stations were not added to the Technical Specifications. The Fire Protection Technical Specifications were subsequently transferred verbatim to the Operational Specifications as a result of Amendment 157. One of the 19 hose stations was removed from the Fire Protection Program due to pipe/valve freeze concerns. A 10 CFR 50.59 review was performed and found its elimination acceptable based on an adjacent hose station.

The related discrepancy resulting in the missed monthly surveillance of the 3 fire hose stations in the Turbine Building was due to personnel error. When the procedure was recently revised, it incorrectly identified the hose stations in surveillance procedure 3PT-M91 as those in the Control Building at the location of the East Stairwell for elevations of 15', 33' and 53'. A contributing factor was the misinterpretation of Operational Specification Table 3.5.5-1.

The Authority considers the safety significance of the missed surveillance for the 3 fire hose stations in the Turbine Building and the missed commitment to include 19 (now 18) additional hose stations in the Technical Specifications to be minimal. The 3 hose stations on elevations 15', 36'-9", and 53' of the Turbine Building at the location of the Control Building Entrance were inspected in accordance with the requirements of Surveillance Test Procedure 3PT-M91 and were found to be satisfactory. The Authority considers the 18 hose stations to be functional based on the following: a field inspection of the hose stations (excluding those in Containment), the fact that the fire hoses associated with the 18 hose stations undergo hydrostatic testing as part of the Indian Point 3 Fire Protection Program, and the reasonable assurance of water availability by the system valve line-up checks performed on the distribution system. Additionally, of the 18 hose stations, 9 are located in Containment. For these hose stations, a periodic test is conducted on a refueling frequency basis to ensure their operability. The hose stations provided for the Control Building elevation 15' and 33' are used as backup to the primary CO_2 Fire Suppression System.

Upon discovery of these discrepancies, the Authority took or will take the following corrective actions:

- The 3 hose stations on elevations 15', 36'-9", and 53' of the Turbine Building at the location of the Control Building Entrance were inspected in accordance with the requirements of Surveillance Test Procedure 3PT-M91 and were found to be satisfactory.

- The Authority will revise surveillance test procedures to add the 18 additional hose stations addressed in References 1 and 2, and will complete all surveillance tests by January 31, 1996. (Surveillance of hose stations in Containment will be performed during the next refueling outage).

- By February 28, 1996, the Authority will revise the Operational Specifications to include 18 additional hose stations for surveillance as committed by the Authority and addressed in References 1 and 2. Valve numbers associated with the hose stations will be added to Operational Specification Table 3.5.5-1 to preclude inadvertently applying different hose stations to procedure revisions.

- By February 1, 1996, the Authority will review recent revisions of all other Fire Protection procedures to identify potential deficiencies.

- During the Fire Protection DBD Consolidation process, the Authority will perform a review of other Fire Protection related Operational Specifications to identify potential discrepancies. This review will be completed by August 1, 1996.

The commitments associated with this letter are in Attachment I.

If you have any questions regarding this letter, please contact Mr. K. Peters.

Very truly yours,

L. M. Hill
Site Executive Officer

att: as stated

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Summary of Commitments

Number	Commitment	Due Date
IPN-95-131-01	Revise surveillance test procedures to include the 18 additional fire hose stations addressed in the NRC Safety Evaluation Reports of March 6, 1979 and May 2, 1980.	Prior to the next normally scheduled surveillance.
IPN-95-131-02	Perform required surveillance tests for the 18 additional hose stations addressed in the NRC Safety Evaluation Reports of March 6, 1979 and May 2, 1980.	January 31, 1996. Surveillance of the hose stations in Containment will be performed during the next refueling outage.
IPN-95-131-03	Review recent revisions of all Fire Protection procedures to identify potential deficiencies.	February 1, 1996.
IPN-95-131-04	Revise Operational Specifications to include surveillance requirements and valve numbers for the 18 additional fire hose stations addressed in the NRC Safety Evaluation Reports of March 6, 1979 and May 2, 1980.	February 28, 1996.
IPN-95-131-05	Review Fire Protection related Operational Specifications during the Fire Protection DBD consolidation process to identify potential discrepancies.	August 1, 1996.