Nuclear Power Plant
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New York Power Authority

Robert J. Barrett
Plant Manager

August 12,1996
IPN-96-083

Mr. Hubert J. Miller
Regional Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Supplement to 30 Day Special Report Related to the Inoperable Electrical Tunnel Fire Protection Water Spray Systems

Dear Mr. Miller:

New York Power Authority (NYPA) letter IPN-95-124, dated December 1, 1995, provided a 30 day report on the inoperable electrical tunnel water spray systems as required by administrative controls found in IP3 Operational Specification 3.5.2. In the 30 day report, the Power Authority committed to provide supplemental information if the electrical tunnel water spray systems were not operable by July 15, 1996. This letter provides supplemental information and a revised schedule, the significance of this change, and the reasons for the current schedule.

The electrical tunnel fire protection water spray systems (four systems) will be restored to operability by February 28, 1997. The new operability date is a change to a commitment (IPN-96-124-04) schedule contained in letter IPN-96-124, and will also extend the schedule for another commitment (IPN-96-124-03) regarding a safety assessment of the modification, to the same time, since the safety assessment is part of the modification process.

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The milestones currently planned to support this completion date are:

- PORC approval of modification package - August 26, 1996
- Initiate construction in lower cable tunnel - September 16, 1996
- Declare lower cable tunnel sprinkler systems operable - November 18, 1996
- Initiate construction in upper cable tunnel - November 25, 1996
- Declare upper cable tunnel sprinkler systems operable - February 28, 1997.

The revised schedule is not significant with respect to fire protection. The 30 day report noted that the Power Authority had performed a safety evaluation that determined that operation with compensatory action was acceptable for plant startup. That safety evaluation has been reviewed and the schedule change has no effect on the conclusions of that determination. Additionally, the approach to restoring the systems to operability will leave the existing systems in service (even though they are considered inoperable under the operational specifications) until construction is ready to start. When construction starts, work will be done on only one tunnel at a time.

The Power Authority will maintain compensatory actions in place in accordance with the Indian Point 3 Operational Specifications until the electrical tunnel water spray systems are declared operable. The current compensatory actions require a continuous fire watch with backup fire suppression equipment or an hourly fire watch with backup fire suppression equipment when all smoke detectors in the affected area are demonstrated to be operable on a monthly basis.

During the constructability review phase, there were a number of items that affected the schedule. The design approach was altered to correct support deficiencies, eliminate the need for temporary supports and remove support interferences identified during the constructability walkdown. The constructability walkdown identified changes where it would cost as much to salvage portions of the branch lines as to rebuild them and changes to make minor corrections to the location of nozzles, when the branch lines were rebuilt, to eliminate obstructions. These changes to the design approach affected design scope and construction duration.

The Power Authority will provide additional information on the corrective action to the electrical tunnel water spray systems if the schedule should be delayed more than 30 days beyond February 28, 1997.

If you have any questions regarding the subject matter, please contact Mr. K. Peters at (914) 736-8029. The commitment found in this letter is attached.

Very truly yours,

Robert J. Barrett
Plant Manager
Indian Point 3 Nuclear Power Plant

cc: U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

Nuclear Mutual Limited
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Wilmington, Deleware 19801
Attention: J. W. Quinnette Jr.

Attachment 1
List of Commitments

Number	Commitment	Due
IPN-96-083-01	The Power Authority will provide additional information on the corrective action to the electrical tunnel water spray systems if the schedule should be delayed more than 30 days beyond February 28, 1997.	March 28, 1997