

Indian Point 3  
Nuclear Power Plant  
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914 736 9001



**New York Power  
Authority**

Robert J. Barrett  
State Executive Director

November 24, 1998  
IPN-98-124

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

Subject: Indian Point Nuclear Power Plant Unit 3  
Docket No. 50-286  
**Ignition Temperature of Cables**  
**Passing Through Penetration Seals (TAC No. M96085)**

References: See below.

Dear Sir:

This letter informs the NRC of a change to a fire protection commitment. Reference 1 documented Unresolved Item (URI) 50-286/93-24-03 regarding the auto-ignition temperature of cables used at Indian Point 3 (IP3). Specifically, the concern was that the Authority had not adequately demonstrated that the auto-ignition temperature of insulation of cables which pass through penetration fire seals installed at IP3 was sufficiently above the maximum unexposed-side temperature recorded at the conclusion of the penetration seal's qualifying three-hour fire endurance test.

References 5, 7, and 8 provided the Authority's technical bases for concluding that the minimum auto-ignition temperature of cables used at Indian Point 3 is sufficiently above the maximum permitted unexposed-side temperature such that auto-ignition of cables on the unexposed side of the fire seal would not occur. This ensures that the effects of a fire will be limited to a discrete fire area or zone and that safe shutdown systems will remain available following the fire.

Subsequent to the Authority's submittal of December 23, 1996 (Reference 7), several telephone conversations and meetings were held between NRC and Authority staff regarding this issue. The most recent meeting took place with NRR and NRC Region I personnel on October 15, 1998, in the NRC's King of Prussia office. The information previously provided in References 5, 7, and 8, in addition to new data and information supporting the conclusion that cable auto-ignition temperatures are sufficiently above the maximum permitted unexposed-side temperature was presented, reviewed, and discussed. It was concluded at the end of the meeting that Authority staff would review the available material and prepare an engineering evaluation documenting the

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resolution of the issue. The technical bases for resolution of URI 50-285/93-24-03 has been documented in an engineering evaluation (Reference 9) and is available for NRC review.

Fire watches were established as a compensatory measure while this issue was being resolved (References 2 and 4). Based on a commitment change evaluation, conducted in accordance with NEI's "Guidelines for Managing NRC Commitments" and supported by the engineering evaluation (Reference 9), the Authority has determined that the fire watches are no longer required and they have been removed.

No new commitments are made by the Authority in this letter. If you have any questions, please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,



Robert J. Barrett  
Site Executive Officer  
Indian Point 3 Nuclear Power Plant

- References:
1. NRC Letter to NYPA, "NRC Region I Inspection 50-286/93-24", dated December 14, 1993.
  2. NRC Letter to NYPA, "Special Inspection to Review Fire Protection and Appendix R Restart Items, Inspection Report No. 50-286/95-81", dated May 11, 1995.
  3. NYPA Letter to NRC, "Readiness to Restart Indian Point 3", dated June 12, 1995.
  4. NRC Letter to NYPA, "Special Inspection to Review Engineering-Related Items, Indian Point 3 Inspection 95-10", dated July 26, 1995.
  5. NYPA Letter to NRC, "Response to Unresolved Item 50-286/93-24-03", dated April 24, 1996.
  6. NRC Letter to NYPA, "Request for Additional Information - Indian Point 3 Nuclear Power Plant Cable Ignition Temperature of Cables Passing Through Penetration Seals (TAC No. M96085)", dated September 19, 1996.
  7. NYPA Letter to NRC, "Response to Request for Additional Information - Indian Point 3 Nuclear Power Plant Cable Ignition Temperature of Cables Passing Through Penetration Seals (TAC No. M96085)", dated December 23, 1996.

8. IP3-ANAL-FP-01392, "Fire Seal Evaluation - Self Ignition Temperature of Cable Insulation as it Relates to the Design of Fire Seals", Rev. 1, dated May 22, 1995.
9. IP3-RPT-FP-02862, "Fire Seal Evaluation - Cable Ignition Temperatures of Cables Passing Through Penetration Seals", Rev. 0, dated October 22, 1998.

cc: U.S. Nuclear Regulatory Commission  
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U.S. Nuclear Regulatory Commission  
Resident Inspector's Office  
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