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February 16, 1979
IPN-79-5

Director, Division of Operating Reactors
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
IE Bulletin No. 79-01

Dear Sir:

The Power Authority has reviewed IE Bulletin No. 79-01 concerning the environmental qualification of Class IE equipment, and specifically the NAMCO stem mounted limit switches (SMLS). The Power Authority has determined that certain of the NAMCO Model EA-700 unqualified limit switches are installed in the Indian Point 3 facility on safety related valves inside containment. This information was verbally transmitted by Mr. S. Zulla, Technical Services Superintendent at IP-3 to Mr. L. Olshan, Project Manager (NRR) and Mr. D. Johnson, the I&E site inspector, on February 14, 1979.

This letter constitutes the detailed written report required by the subject Bulletin which identifies the items which do not meet the qualification requirements for service and provides a justification for continued plant operation.

The NAMCO Model EA-700 unqualified stem mounted limit switches are installed on the following valves:

856B, 856G	High Head Safety Injection System - Hot Leg Injection
PCV 1190	Containment Pressure Relief
FCV 1170, FCV 1172	Containment Purge Supply and Exhaust

The failure modes considered for these unqualified SMLS would be closure of the contacts or a short around the contacts.

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S,P

Valves 856B, 856G

The SMLS is redundant to the limit switch in the Limitorque operator. These valves are normally closed and power removed, per the Technical Specification requirements. These valves are operated only during the recirculation phase of safety injection. The failure of the SMLS will neither prevent the valve from operating, nor prevent its position from being indicated in the Control Room since the Limitorque operators have qualified limit switches.

PCV 1190

Two SMLS provide valve position and control. Failure of the SMLS used for control due to environmental conditions will not result in inadvertent valve operation since this valve inside containment is interlocked with its redundant valve outside containment which has a qualified SMLS. Furthermore, a containment ventilation isolation signal will insure that this valve is closed regardless of SMLS operation. A third isolation valve is also located outside containment in this pressure relief line in series with the other two valves.

FCV 1170, FCV 1172

SMLS provide valve position and are utilized in the control circuits of its associated valve. The SMLS from both valves are in series in the valve opening circuitry. Failure of both SMLS could cause these valves to open. However, if a containment ventilation isolation signal is present, the valves will remain closed. A control switch on the control room supervisory panel when positioned to close will also maintain the valves in the closed condition, regardless of SMLS operation. This switch will be maintained closed except during purging operations and will be checked closed prior to resetting containment ventilation isolation following a LOCA. This procedure will remain in effect until such time as qualified SMLS are installed.

The Power Authority plans to replace the SMLS on the above mentioned valves inside containment with qualified SMLS. This will be accomplished as soon as qualified replacement switches are available and at an outage of sufficient duration necessary to install these SMLS.

Based on the information presented above, the Power Authority believes that continued operation of the Indian Point 3 facility

is justified and that such operation will not be inimical to the health and safety of the public.

Very truly yours,

Paul J. Early
Assistant Chief Engineer-
Projects

cc: Mr. Boyce H. Grier, Director
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