



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

F NRC PDR
50-247
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November 2, 1978

Docket No. 50-247

OFFICE OF THE SECRETARY
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Consolidated Edison Company of
New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

Gentlemen:

This letter relates to the Indian Point, Unit 2 fire protection review. By letter dated September 18, 1978, you responded to our request for additional information and our positions which were sent to you on August 31, 1978. In reviewing your September 18, 1978 submittal we have developed additional requests and positions, which were telecopied to you on October 18, 1978 and are included in Enclosure 1 of this letter.

In order for us to maintain our fire protection review schedule for your plant, we asked that you respond to all of the enclosed requests and positions by November 17, 1978. Your continued cooperation is requested so that we can complete our review of your fire protection program for Indian Point, Unit 2 as soon as possible.

Sincerely,

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

cc: See next page

Enclosures:

1. Requests for Additional Information
2. Staff Positions

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Consolidated Edison Company
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REQUESTS FOR ADDITIONAL INFORMATION

INDIAN POINT UNIT 2 - FIRE PROTECTION

DOCKET NO. 50-247

15. From the response to staff position P5, it appears questionable that the IP-2 firestop designs are sufficiently similar to the Turkey Point firestops to rely on the tests of the Turkey Point firestops for qualification of IP-2 firestops. To further compare the two designs, it is requested that a copy of drawing 9321-F-3107 (UE&C number) be provided. This drawing is referenced in the Con Ed response to position P5.
16. Verify that the insulated metal portion between the turbine building and the control building will be upgraded to three-hour fire-rated.
17. The response to staff request 11 references a study performed on effects of fires in the solidification room of the integrated liquid waste handling building. The response indicates that such postulated fires would not result in excessive releases; however, no detail is provided on the results of the study to allow a staff conclusion. Describe the amount of evaporator bottoms considered in the evaluation, and the types and quantities of isotopes that potentially could be released.

STAFF POSITIONS

INDIAN POINT UNIT 2-FIRE PROTECTION

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- P36. The response to staff position P4 describes air flow monitors for battery room ventilation systems, but did not respond to the position on periodic check of these monitors. These monitors should be checked at least once per shift to verify ventilation air flow, or an alarm provision should be added to alarm in the control room on loss of ventilation air flow.
- P37. The response to position P12 indicates that Con Ed is evaluating design improvements that may be made to the reactor coolant pump lube oil system to reduce the potential for leakage. However, the adequacy of the existing oil collection system has not been demonstrated to collect oil from potential leakage points.

To demonstrate adequacy of protection for reactor coolant pump lube oil fires, the oil collection system should be evaluated to assure its adequacy to collect leakage from potential leakage points identified in staff position P12 where these leakage points will not be removed by design improvements to the lube oil system. Modifications to the oil collection system should be made if required to collect leakage from potential leakage points which are found not to have adequate protection with the existing collection system. Drawings should be provided to demonstrate the adequacy of the oil collection system and to illustrate modifications to be made to the oil collection system and to the lube oil system.

- P38. In response to various staff positions, Con Ed has referenced a proposed alternate shutdown system independent of various areas, with cabling separated from existing cabling if in the same area. The following items are unacceptable as described, or not addressed by Con Ed:
- a. Loss of Offsite Power - Con Ed does not consider the loss of offsite power in conjunction with a fire to be a credible event. The alternate shutdown system as proposed would rely on offsite power solely. The staff position is that the equipment required to bring the plant to hot-standby conditions should as a minimum be accessible to the

emergency diesel generators, and the emergency diesel generators should also be available independent of fire damage in the cable spreading room, control room, electrical cable tunnel, and switchgear room. If the cable tunnel and/or switchgear rooms are to be used for providing this source of emergency power, staff positions P13 and P14 should be satisfied.

- b. System Control - The description of the alternate shutdown system does not describe the method of control of the various components. Describe the routing of the control cables for the alternate shutdown system, location of the control point, and source of power for the control circuits.
- c. Manpower Requirements - Identify the number of personnel required to perform safe shutdown using the alternate shutdown system proposed.
- d. Procedural Controls - Verify that a procedure will be developed and implemented for effecting safe shutdown using the alternate shutdown system.

P33. The response to staff position P8 describes the Con Ed basis for not providing a fixed suppression system in the cable spreading room. Although a capability to safely shutdown will be provided independent of the cable spreading room, the staff has taken the position, as in reviews of other plants, that a fixed suppression system be provided in the cable spreading room to afford a means to control and suppress a large fire. Such capability would not adequately be afforded by the fire brigade. This position was taken on Oconee (Duke Power Co.) and was discussed between IIRC and Duke Power Co. management prior to acceptance by Duke. Similar positions have been taken on other plants. The response to staff position P8 provides no new information, so that the staff position remains on providing a fixed suppression capability for the cable spreading room.