

POWER AUTHORITY OF THE STATE OF NEW YORK

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August 11, 1980

IPN-80-77

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Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Confirmatory Order (Interim Actions)  
Six Month Responses

Dear Sir:

In accordance with the Commission's February 11, 1980  
Confirmatory Order, the following responses are provided for  
the six (6) month action items:

F.1. Conduct a review of past Licensee Event Reports (LERs) at  
Indian Point Units 2 and 3. These LERs shall be reviewed  
to identify design inadequacies (common mode failures,  
systems interactions, etc.), procedural and training  
inadequacies, and man-machine/human factor inadequacies.  
Recommendations shall be submitted for correction of the  
base cause of the subject LERs. Immediate corrections of  
deficiencies will be made when possible, with the required  
notifications to be made to the NRC.

RESPONSE:

The Authority and the Consolidated Edison Co. have jointly re-  
viewed past LERs as required. The results of this review are  
enclosed as Attachment I.

F.2. Meet meteorological acceptance criteria for emergency  
preparedness contained in Annex 1 to this Appendix.

RESPONSE:

The Authority and the Consolidated Edison Co. have complied with  
the Annex 1 meteorological criteria. A detailed description of  
compliance is provided in Attachment II.

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F.3. Conduct a study to determine and document the method by which its plant complies with current safety rules and regulations, in particular those contained in 10 CFR Parts 20 and 50.

RESPONSE:

The Authority has completed a study of compliance with 10 CFR Parts 20 and 50. The compliance study is enclosed as Attachment III.

F.4. Evaluate the reliability and failure modes of selected systems/components as follows:

- a. Failure Mode Effects Analysis: Examine the failure modes (random failures and consequences of outages in support systems) of the active components on the reactor coolant pressure boundary. Assess the acceptability of these failure modes.
- b. Implement Failure Mode Effects Analysis for minor departments from operating, maintenance and emergency procedures.
- c. Explore ways to improve the reliability of those components with a particularly high failure rate as delineated in NUREG/CR-1205.

RESPONSE:

The Authority and the Consolidated Edison Co. have jointly evaluated the reliability and failure modes of selected systems/components as required above. The results of this evaluation are enclosed as Attachment IV.

F.5. Attain full compliance with NRC letters concerning AFW reliability improvements.

RESPONSE:

The Authority has attained full compliance with all NRC letters concerning the AFW Systems to date. The following outstanding submittals which were due to the Commission on August 11, 1980 are enclosed as Attachment V:

- 1) AFW turbine driven pump missile analysis results.
- 2) Response to the NRC November 7, 1979, enclosure 2 request for information regarding the basis for AFW flow requirements.

- 3) Results of the 48 hour endurance tests for the two motor driven APW pumps and justification for the acceptability of the original turbine driven pump test results.
- 4) Proposed Technical Specifications for the valves in the single line from the condensate storage tank.

Very truly yours,

*George M. Wilverding*  
George M. Wilverding  
Manager-Nuclear Licensing