



**New York Power  
Authority**

**J. Phillip Bayne**  
Executive Vice President  
Nuclear Generation

September 8, 1983

IPN-83-75

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

Attention: Darrell G. Eisenhut, Director  
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Required Actions Based on Generic Implications  
of Salem ATWS Events (Generic Letter 83-28,  
dated July 8, 1983)

Dear Sir:

Generic Letter 83-28 requires licensees to furnish, within 120 days from the date of this letter, the status of current conformance with the NRC positions contained therein and plans and schedules for any needed improvements to achieve full compliance with these positions.

The New York Power Authority has completed a detailed review and evaluation of the criteria and requirements outlined in the NRC stated positions. Based on this evaluation and in accordance with provisions of the subject Generic Letter, the Authority has determined that for certain action items an extension of time is needed to submit the required information. Attachment A to this letter identifies these items and provides a description of our plans of action and associated proposed implementation schedules.

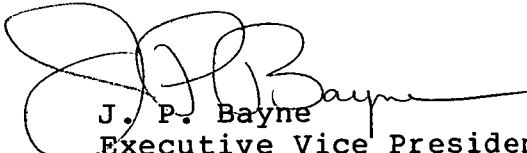
The Authority is aware of the priorities the NRC staff has assigned for the completion of the Generic Letter action items and accordingly is proceeding expeditiously. In order to ensure that this goal is achieved over the longer-term for some actions, it will be most beneficial to establish a nuclear utilities participation through Owner's Groups. As indicated in the enclosed attachment, the Authority is a member of both the Westinghouse Owner's Group (W-OG) and a Nuclear Utility Task Action Committee (NUTAC) sponsored by the INPO Analysis and Engineering Division Industry Review Group (IRG). Accordingly, our schedules are consistent with these industry groups projected completion schedules.

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The Authority considers the extensions identified in Attachment A justified on the basis of the extensive internal effort required to complete these tasks and maintaining uniformity with the completion dates provided by the W-OG and INPO NUTAC programs. These proposed extension schedules were mutually agreed upon with the NRC Project Manager for Indian Point 3. The Authority will submit a description of our conformance to each item of the Generic Letter by the requested 120-day response due date.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

  
J. P. Bayne  
Executive Vice President  
Nuclear Generation

Enc: Attachment A  
cc: attached

State of New York  
County of Westchester

Subscribed and Sworn to before me  
this 8 day of September, 1983

  
\_\_\_\_\_  
Notary Public

JEANNE LA LUNA  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 60-4614305  
QUALIFIED IN WESTCHESTER COUNTY  
TERM EXPIRES MARCH 30th 1985.....

cc: Resident Inspector's Office  
Indian Point Unit 3  
U. S. Nuclear Regulatory Commission  
P. O. Box 66  
Buchanan, New York 10511

## ATTACHMENT A

### REQUIRED ACTIONS BASED ON GENERIC IMPLICATIONS OF SALEM ATWS EVENTS (GENERIC LETTER 83-28, DATED JULY 8, 1983) - REQUEST FOR AN EXTENSION OF TIME TO RESPOND TO CERTAIN ITEMS

#### 2.1 Equipment Classification and Vendor Interface (Reactor Trip System Components)

The Indian Point 3 Reactor Trip System (RTS) includes components supplied by Westinghouse, Foxboro and other vendors.

Regarding the vendor interface program, the Westinghouse Owners Group (W-OG) is presently proposing to review the requirements of this action, among others, as it pertains to Westinghouse-supplied components. Following approval of the proposed program, expected at the W-OG meeting of September 27 and 28, 1983, the NRC will be notified of the schedule for completion of this portion of Item 2.1. Similar vendor interface programs will be established for the other suppliers, and you will be informed as soon as a final schedule becomes available.

#### 2.2 Equipment Classification and Vendor Interface (Programs for all Safety-Related Components)

With regard to the vendor interface program (Item 2.2.2) it should be noted that the Authority is a member of a Nuclear Utility Task Action Committee (NUTAC) formed on September 1, 1983, for the specific purpose of defining an appropriate vendor interface program.

While participating in the NUTAC, we will concurrently evaluate, in more detail, our plant's existing capabilities for interfacing with our vendors. After completion of the NUTAC's efforts, we will submit our program description to the NRC by May 1, 1984.

#### 3.1.2 Post-Maintenance Testing (Reactor Trip System Components - Vendor and Engineering Recommendations)

For Item 3.1.2, a review of the manufacturer's guidance for testing of the reactor trip breakers has been performed and existing reactor trip breaker surveillance and test procedures reflect the appropriate recommendations. A review will be performed of the manufacturer and vendor test

guidance, presently available in the IP-3 technical files, for the other safety related components in the reactor trip system, to ensure that post-maintenance testing procedures reflect appropriate vendor guidance. The review of available vendor information will be performed within the 120-day response time, but the final review will not be complete until Item 2.1 of Generic Letter 83-28 insures that vendor and manufacturer information is current and complete. Although Item 3.1.2 will be partially completed before the 120-day deadline, it is necessary to first complete Item 2.1. Therefore, contingent upon a timely completion of Item 2.1, a report describing our status of conformance and a schedule to achieve full compliance with the requirements of action Item 3.1.2 is anticipated to be provided to the NRC by July 1, 1984.

3.2.2 Post-Maintenance Testing (All Other Safety-Related Components - Vendor and Engineering Recommendations)

For Item 3.2.2, a review will be performed of the manufacturer and vendor test guidance, presently available in the IP-3 technical files, for safety related components to ensure that post-maintenance testing procedures reflect appropriate vendor guidance. The review of available vendor information will be performed within the 120 day response time, but the final review will not be complete until Item 2.2 insures that vendor and manufacturer information is current and complete. Although Item 3.2.2 will be partially completed before the 120-day deadline, it is necessary to first complete Item 2.2. Therefore, in accordance with the schedule established for the response to Item 2.2, a report describing our status of conformance and a schedule to achieve full compliance with the requirements of action Item 3.2.2 will be provided to the NRC by July 1, 1984.

4.2 Reactor Trip System Reliability (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)

The W-OG is proposing to Westinghouse to perform the life cycle testing of reactor trip breakers (Items 4.2.3 and 4.2.4). As stated in the Generic Letter action Item 4.2.2, the parameters which could affect operability of the reactor trip breakers should be identified during the determination of breaker life cycles (Item 4.2.4). Once identified, a mechanism can then be established to accomplish the trending program.

Following the approval of the W-OG proposed program, the NRC will be notified of the schedule for completion of Items 4.2.2, 4.2.3 and 4.2.4.