



August 25, 1986
IPN-86-40

John C. Brons
Senior Vice President
Nuclear Generation

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

Attention: Mr. Steven A. Varga, Director
PWR Project Directorate No. 3
Division of PWR Licensing-A

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Generic Letter 83-28: Items 2.1 and 2.2 -
Equipment Classification and Vendor Interface
(TAC #s M52847 and M53681)

- Reference:
1. Letter from Mr. J. D. Neighbors to Mr. J. C. Brons, dated March 3, 1986, "Safety Evaluation Related to Generic Letter 83-28, Items 3.1.1, 3.1.2, 3.2.1, 3.2.2, 4.1 and 4.5.1."
 2. Letter from Mr. J. C. Brons to Mr. S. A. Varga, dated May 17, 1985, "Additional Information Regarding Generic Letter 83-28."
 3. Letter from Mr. J. P. Bayne to Mr. D. G. Eisenhut, dated July 3, 1984, "Required Actions Based on Generic Implications of Salem ATWS Events."

Dear Sir:

The purpose of this letter is to update the Indian Point 3 (IP-3) plant status in complying with Salem ATWS required actions, Item 2.1 Equipment Classification and Vendor Interface (Reactor Trip System Components) and Item 2.2 Equipment Classification and Vendor Interface (Programs for All Safety-Related Components). Reference 1 issued a safety evaluation (SER) on Post-Maintenance Testing Items 3.1.1, 3.1.2, 3.2.1 and 3.2.2. The SER was based, in part, on the Authority's commitments in References (2 and 3) to Generic Letter 83-28, Items 2.1 and 2.2. Since these items are still under review by the NRC, the Authority is taking this opportunity to provide the Staff with their current status and clarify statements made in the Reference (1) SER.

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With respect to Item 2.1, Reference (2) reported that a Reactor Trip System (RTS) component list was under final review. In Reference (1) under Items 3.1.1 and 3.1.2 of Item 3.1 (Post-Maintenance Testing-RTS Components), it appears that the SER assumed this list was incorporated into "appropriate procedures" at IP-3. The RTS list was an early attempt to establish a reduced scope equipment list from the current Reactor Protection System (RPS) to directly address the classification concerns of Generic Letter 83-28. Before the finalization of the RTS list, the Authority initiated a major effort to establish a Master Equipment List (MEL) for classifying equipment using a different methodology. A decision was made to include the RPS as one of the first systems to be classified with the new MEL methodology, thus eliminating the need for a separate RTS list.

The RPS list identifies the level of classification of all RPS equipment and does not distinguish RTS components from the RPS. Review and approval of this RPS equipment list is scheduled for completion by November 1, 1986. Based on achieving this date, this list should be referenced or incorporated into plant procedures or programs that control safety-related activities affecting maintenance, work orders and parts replacement for the RPS in January 1987. Also, in January 1987, drawings and manuals containing safety-related RPS components should be stamped to indicate that they contain information dealing with safety-related systems.

Another area of potential misunderstanding in Reference (1) under Items 3.1.1 and 3.1.2, occurs where the SER reads:

"All Westinghouse (NSSS-Vendor) Technical Bulletins applicable to IP-3 have been collected and reviewed. The licensee has been actively participating in the INPO NUTAC Vendor Equipment Technical Information Program (VETIP) and has incorporated recommendations into the existing programs. For other non-NSSS vendors of safety-related equipment, the licensee is collecting information through VETIP and is in the process of upgrading IP-3 vendor interface programs."

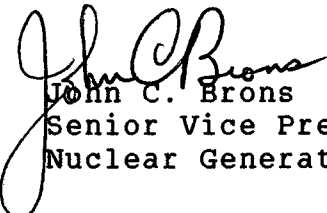
The Authority has restructured its Operating Experience Review Group (OERG) as part of its commitment in Reference (2) to implement VETIP recommendations as they apply to the handling of safety-related technical information at IP-3. This includes the collection and review of all Westinghouse Technical Bulletins applicable to IP-3. However, formal documentation of all technical bulletin reviews has not been completed in all cases. The OERG will continue these reviews and evaluate plant actions taken in response to applicable bulletins, documenting their resolution as necessary.

In Reference (1) under Items 3.2.1 and 3.2.2 of Item 3.2 (Post-Maintenance Testing - All Other Safety-Related Components), the SER associates implementation of the MEL by December 1986 with completion of our post-maintenance testing review of all other safety-related components. However, the scope of work involved in the MEL project is much larger than originally anticipated. Review of approximately 40,000 component data sheets will delay completion and implementation of the MEL past the mid-1986 and December 1986 estimates of Reference (2) and Reference (3), respectively. Component lists for all other safety-related systems (Item 2.2) are now expected to be completed in April 1987. A schedule for incorporation of these lists into information handling systems affecting safety-related activities will be provided to the NRC Staff shortly thereafter.

A summary of the above status of equipment classification and vendor interface at IP-3 is provided to avoid any potential misinterpretation regarding statements made in Reference (1) on this issue. The RTS list, as described in Reference (1), and its associated data base have not been incorporated into applicable procedures. Instead, an expanded list to be used in classifying all RPS components (as noted above) will be completed by November 1, 1986 and referenced in procedures, where appropriate, by January 1987. Formal documentation of Westinghouse Technical Bulletin reviews will be completed as necessary pending resolution of on-going OERG evaluation of plant actions in response to these bulletins. The safety-related portion of the MEL will be completed by April 1987 with a schedule for implementation into applicable programs affecting safety-related activities to be established shortly thereafter.

In conclusion, the Authority believes the above information should provide you with a better understanding regarding the nature and status of equipment classification and vendor interface at IP-3. Should you or your staff have any questions regarding this subject, please contact Mr. P. Kokolakis of my staff.

Very truly yours,


John C. Brons
Senior Vice President
Nuclear Generation

cc: See next page

cc: Resident Inspector's Office
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60-206

TO: NRC Document Control CONTROL COPY NO.: 25
FROM: MARY ANN CHAUBARD MAC DATE: 08/15/86
SUBJECT: DISTRIBUTION OF THE INDIAN POINT #3 EMERGENCY PLAN REVISIONS

The enclosed sheets are revisions to your controlled copy of the IP-3 Emergency Plan. Please discard the old sheets, insert the attached sheets, initial and date this transmittal sheet, and return it to Ms. Terry Ryan, IP-3 Documents Supervisor.

VOLUME I - EMERGENCY PLAN NO CHANGE

OLD: NEW:

VOLUME II - EMERGENCY RESPONSE ACTIVATION

| | | | |
|-------------|--------------------------------------|-------------|--------------------------------------|
| <u>OLD:</u> | Vol. II Cover Sheet, Rev. 17 | <u>NEW:</u> | Vol. II Cover Sheet, Rev. 18 |
| | Table of Contents - Pgs. i & ii | | Table of Contents - Pgs. i & ii |
| | Control Room - Pgs. CR-5 & CR-6 | | Control Room - Pgs. CR-5 & CR-6 |
| | OSC Section - Pg. OSC-15 | | OSC Section - Pg. OSC-15 |
| | Security Section - Pgs. S-1 thru S-4 | | Security Section - Pgs. S-1 thru S-4 |

VOLUME III - EMERGENCY PLAN IMPLEMENTING PROCEDURES

| | | | |
|-------------|--------------------------|-------------|--------------------------|
| <u>OLD:</u> | Index, Rev. 40 (2 pages) | <u>NEW:</u> | Index, Rev. 41 (2 pages) |
| | IP-1050, Rev. 10 (ALL) | | IP-1050, Rev. 11 (ALL) |

I acknowledge the receipt of these revisions to the IP-3 Emergency Plan.

_____/_____
(Signature) (Date)

Enclosures
MAC:mm

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Indian Point 3
Nuclear Power Plant
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New York Power
Authority

EMERGENCY PLAN PROCEDURES

PROCEDURE NO. IP- VOLUME II REV. 17

TITLE " EMERGENCY RESPONSE ACTIVATION PROCEDURES "

WRITTEN BY: M. McCaughy

REVIEWED BY: [Signature]

PORC REVIEW: M. P. Can DATE 7/10/86

APPROVED BY: W. J. Long DATE 7/10/86

EFFECTIVE DATE: 07/21/86

NEW YORK POWER AUTHORITY
INDIAN POINT NO. 3 NUCLEAR POWER PLANT
EMERGENCY PLAN - VOLUME II
EMERGENCY RESPONSE ACTIVATION

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SHIFT SUPERVISOR/SRO RESPONSIBILITIES

CLASSIFY:

Determine emergency classification.

- If NUE, fill out EP-Form 30a using black ink and do not abbreviate with initials (i.e., LOCA - Loss of Coolant Accident; PAB - Primary Auxiliary Building) as requested by New York State. Then go directly to the Control Room Communicator Responsibilities Checklist under Notifications (Page CR-7).

ASSIGN:

Designate a Control Room Communicator (initially second Reactor Operator in Control Room as circumstances permit).

STAFF:

Determine which onsite support centers should be activated:

AT THE ALERT CLASSIFICATION:

- a. Normal hours - ensure PA announcements are made:

"All Technical Support Center personnel report to the TSC."

"All Operations Support Center personnel report to the OSC."

"Shift Technical Advisor report to the Control Room."

"All other personnel remain at your work locations and await further instructions."

- b. Off hours - instruct Security to call in Roster II individuals.

AT THE SAE OR GE CLASSIFICATION:

- a. Notify Con Edison Unit #2 Control Room (██████████) before sounding alarm.

Sound the Site Assembly Alarm to initiate site accountability and activate all onsite emergency facilities.

- b. Normal hours - ensure PA announcement is made:

"A (state Emergency Classification) Emergency has been declared. All non-watch personnel report to your Assembly Area. Contingency workers and spare Operations personnel report to the Control Room."

- c. Off hours - instruct Security to call in Roster II individuals.

SHIFT SUPERVISOR/SRO RESPONSIBILITIES - (Cont'd)

DATA: Assist Control Room Communicator in completing New York State Radiological Emergency Data Form (EP-Form 30a).

Initiate dose projection calculations as necessary (IP-1001).

FORMS: Complete and telecopy EP-Form 31c (Plant Status Log - Equipment) to the TSC (when activated) approximately every 30 minutes or as status changes.

If SPDS is not available, telecopy EP-Forms 31a and 31b to the TSC when manned.

ACCOUNTABILITY: Assure accountability list is made.

DISPATCH: Dispatch on and offsite monitoring teams as necessary. (IP-1010, Onsite Teams - direct HPs to appropriate site boundary sectors.) (IP-1011, Offsite Teams - call Con Edison Control Room (526-5294/5295) to activate teams.)

Dispatch Repair and Corrective Action Teams (IP-1025) or Search and Rescue Teams as necessary (IP-1054). (If Search and Rescue Team, update Lead Accountability Officer of status.)

TURN OVER
TO EOF:

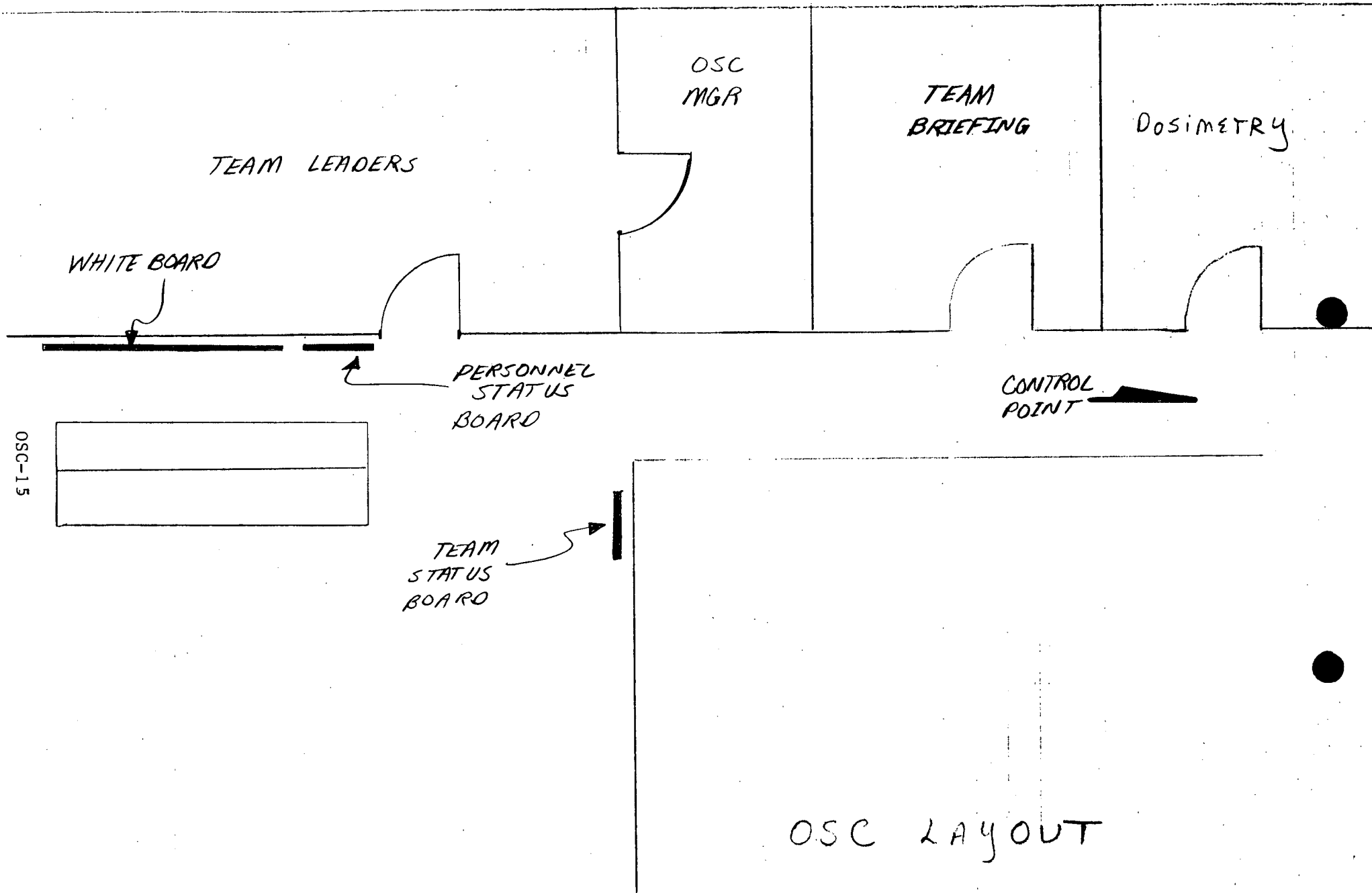
When EOF is staffed:

- a. Turn over Emergency Director responsibilities to EOF.
- b. Assume Emergency Director responsibilities (when POM is not manned in the Control Room) if EOF is moved to AEOF.

CONTINUING
THROUGHOUT:

Assure PA announcements are made every ½ hour to keep site personnel advised of emergency status.

Plant Status Log - EP-Form 31c is sent to the TSC.



SECURITY EMERGENCY ACTIVATION
RESPONSIBILITIES

1.0 DISCUSSION

Initial notification and communication to on and offsite authorities will be directed and accomplished by the Control Room. However, during off hours upon direction from the Shift Supervisor or Control Room Communicator, Security has the responsibility of notifying all Roster I individuals as to the emergency condition with information from the New York State Radiological Emergency Data Form (EP-Form 30a).

Off hours are defined as hours prior to 0800 and after 1630, weekends, and holidays.

If an Alert or higher emergency condition exists during off hours, the Shift Supervisor/Senior Reactor Operator will instruct Security to call in needed Roster II individuals. The Control Room Communicator will instruct Security to restrict access to the site at the Site Area Emergency and General Emergency.

2.0 REFERENCES

- 2.1 Emergency Plan, Volume II - Control Room Section
- 2.2 EP-Forms Section in Volume II
- 2.3 Appendix 'A' in Volume II - Rosters I, II, and III
- 2.4 Emergency Plan, Volume III - Implementing Procedures

3.0 ACTIVATION

See the following checklists for Security responsibilities:

- 1. Security Setup
- 2. Security Responsibilities

SECURITY SETUP

1. Obtain Emergency Supplies:
 - Get Emergency Plan - Volumes I, II, and III out.
 - Get "Book of Forms" out.
 - Phones and headsets out and plugged in.
 - Distribute individual responsibility books.
2. Test radios.
3. Establish accountability.
4. Send Security personnel (2) to EOF (if manned) and to the Joint News Center.
5. Dosimetry set up.

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SECURITY RESPONSIBILITIES

FORMS:

- Have available:
 - EP-Form 30a (New York State Radiological Emergency Data Form).
 - Roster I (fill in with information from EP-Form 30a).
 - Roster II.

RECEIVE:

- Instructions from Shift Supervisor or Control Room Communicator.
- Information on EP-Form 30a.

NOTIFICATIONS: (Off Hours)

- Notify all individuals on Roster I of emergency conditions.
- Notify Control Room when Roster I notifications are complete and who was or was not contacted.

CALL IN:

When instructed by Shift Supervisor or Control Room Communicator:

- Call in all individuals on Roster II for Alert, Site Area, and General Emergency. (Notify Control Room when Roster II notifications are complete.)

SECURITY:

- Restrict access to and from the Site.
- Escort emergency vehicles to needed location.
- Provide guards to maintain security and access control at the EOF and Joint News Center.

DOSIMETRY:

- Distribute dosimetry to Security personnel.

ACCOUNTABILITY:

Normal Hours

- Account for Security personnel.
- Call in to LAO names of site visitors.

Off Hours

- Assume responsibilities of Lead Accountability Officer.
- Call 15' Elevation Machine Shop for personnel list.
- Call Control Room.
- Call Control Point for personnel who may not have signed out.
- Report accountability status to Emergency Director.

NEW YORK POWER AUTHORITY
INDIAN POINT NO. 3 NUCLEAR POWER PLANT
EMERGENCY PLAN - VOLUME III
IMPLEMENTING PROCEDURES

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NEW YORK POWER AUTHORITY
INDIAN POINT NO. 3 NUCLEAR POWER PLANT
EMERGENCY PLAN - VOLUME III
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EMERGENCY PLAN PROCEDURES

PROCEDURE NO. IP- 1050

REV. 10

TITLE " ACCOUNTABILITY "

WRITTEN BY: Margaret McLaughlin
REVIEWED BY: Michael R. [Signature]
PORC REVIEW: [Signature] DATE 4/1/86
APPROVED BY: [Signature] DATE 4/1/86
EFFECTIVE DATE: 04/01/86

IP-1050

ACCOUNTABILITY

1.0 INTENT

This procedure is used during an emergency to assure IP-3 personnel are accounted for.

2.0 DISCUSSION

When the Site Assembly Alarm sounds, all non-watch personnel will report to their assigned assembly areas. A list of all persons missing, and/or at an assembly area other than their assigned one, will be given to the Lead Accountability Officer. These lists will be cross-checked to determine who is actually missing. First cut accountability must be completed in about 30 minutes. The Emergency Director and Lead Accountability Officer will discuss Search and Rescue Team mobilization if necessary.

NOTE: When the Site Assembly Alarm is sounded, the Lead Accountability Officer must call the Construction Trailer to advise them since they cannot hear the Site Assembly Alarm.

In addition, the Lead Accountability Officer must call the Construction Trailer Assembly Area approximately every ½ hour to update personnel as to current plant status.

3.0 WATCH AND NON-WATCH PERSONNEL PROCEDURE

3.1 All non-watch personnel will report to their assembly areas or to the nearest assembly area when the Site Assembly Alarm sounds. Assembly area locations are denoted by large orange signs with blue letters reading "ASSEMBLY AREA". The larger assembly areas have been further subdivided into department sections and personnel shall report to their respective sub areas.

3.2 Security must call the Lead Accountability Officer with a list of visitors on site and who they are visiting.

3.3 The NYPA assembly areas and who reports to them are as follows:

(See Attachment 8.1 for the site map with NYPA assembly area locations.)

(L) Training (Office Area): Training personnel, personnel who are in training classes, or persons in the immediate vicinity.

(K) Admin. Service Building (2nd Floor Lunch Room): Administration Building personnel, Floors 2, 3, and 4 (except H.P., Chemistry, and other designated personnel who will report to the OSC or TSC).

(C) Machine Shop (15' Elevation): All non-watch, maintenance, and construction personnel within the security fence. First Floor (Maintenance) personnel should use this as their assembly area.

- (G) Construction Conference Trailer: NYPA Construction personnel, contractor personnel, and all other personnel in the immediate area and outside the security fence.
 - (J) Warehouse (Office Area): Warehouse personnel and personnel in immediate vicinity.
 - (H) Con Edison Service Center, West Storeroom Area: Personnel may eventually assemble here if evacuation of the site is necessary.
 - (TSC) Technical Support Center personnel should report to the TSC as their assembly area. If a TSC person is at another assembly area, they should report in and then go directly to the TSC.
 - (OSC) Designated Operations Support Center personnel shall report to the Operations Support Center as their assembly area. If an OSC designated individual is at another assembly area, they should report to that area and then go directly to the OSC.
 - All watch, off watch Operations personnel, contingency, and "spares" will report to the Control Room until requested to report to the OSC.
 - (EOF) Designated Emergency Operations Facility personnel shall report to the EOF as their assembly area.
- 3.4 Each Unit Watch or Shift Supervisor shall account for their personnel.
- 3.5 Security shall account for their own personnel.
- 3.6 OFF HOURS
- 3.6.1 Upon hearing the Site Assembly Alarm:
- All non-watch personnel should assemble at the Machine Shop 15' Elevation.
 - TSC, OSC personnel should report accordingly.
 - All watch, contingency, and "spares" should report to the Control Room.

4.0 AREA ACCOUNTABILITY OFFICERS

- Take charge of assembly area, identify Assembly Area Officer and alternate to all personnel.
- Set up assembly area:
 - Check for habitability by reading Ludlum 300 monitor and/or E-530 G-M Meter.
 - If > 10 mR/hr., immediately contact Lead Accountability Officer (LAO) for possible evacuation.
 - Isolate area for single access, have sign-out and sign-in sheets available.
 - If release is in progress or as directed, ensure all personnel frisk prior to entry.

- Perform accountability:
 - Accountability must be completed in about 30 minutes.
 - The Area Accountability Officer has a master list of personnel by department who should be reporting to each designated assembly area.
 - Utilize first line supervisors to account for their personnel.
 - Report unaccounted for and "others" to Lead Accountability Officer.

NOTE: A person should only be accounted for if he/she:

1. is visibly present;
2. is on vacation;
3. is on travel or not on site that day;
4. is on another shift.

If the person is "thought" to be out to lunch, it should be so noted.

- Control area access by sign-in/sign-out sheets at single access point.
- Update assembly area personnel as to general plant condition and developments.
- Continuously monitor Ludlum 300/E-530 for changing radiological conditions. Report changes to LAO.
- Account for "late reporters" as necessary to LAO.
- Contact LAO as necessary to resolve problems requiring immediate attention.
- OFF HOURS:
 - Responsibility for assembly area habitability surveys shall be assumed by the Shift Supervisor and the Watch Health Physics Technician or other individuals designated by the Shift Supervisor.

5.0 LEAD ACCOUNTABILITY OFFICER

- Take charge of accountability.
- Accountability must be completed in about 30 minutes.
- Check area habitability:
 - If > 10 mR/hr., contact H.P. Team Leader in the OSC for direction. If available, an H.P. will be dispatched to assembly area to verify radiation levels.

- Perform accountability using master list of personnel:
 - determine missing and others;
 - cross-check missing and others;
 - obtain visitors list from Security;
 - develop missing persons list;
 - inform Emergency Director of accountability;
 - inform Emergency Director and Area Accountability Officers when accountability is complete.
- If persons on the missing list are considered to be missing within the plant, a page of those persons shall be requested. If there is no response to the page, those names should be given to Security to have a badge check run on them to determine if they are indeed in the plant.
- Discuss Search and Rescue with Emergency Director.
- Discuss evacuation routes with Emergency Director and transmit that information to Area Accountability Officers.
- If evacuation is to the Con Edison Service Center Building, an H.P. will be dispatched (if radiological conditions warrant) to escort them and re-accounting of personnel should be performed upon arrival.
- Keep assembly areas informed of plant conditions.
- OFF HOURS:
 - The Security Shift Coordinator is the Lead Accountability Officer during off hours.
 - The Lead Accountability Officer should call the 15' Machine Shop Assembly Area and the Control Room, TSC, OSC, and Security personnel to gather a list of persons on site.
 - If persons are thought to be missing, a page of these persons should be made and a security badge check should be run if necessary to determine if they are indeed in the plant.

6.0 SEARCH AND RESCUE

- 6.1 A Search and Rescue effort must be discussed with the Emergency Director (the Shift Supervisor is the Emergency Director during the initial stages of an emergency). It is only the Emergency Director who can authorize a Search and Rescue effort.

7.0 PERSONNEL CONTAMINATION CHECK (IP-1060)

- 7.1 If personnel are relocated from an assembly area to the Con Edison Service Center due to radiation levels, they should be checked for contamination.

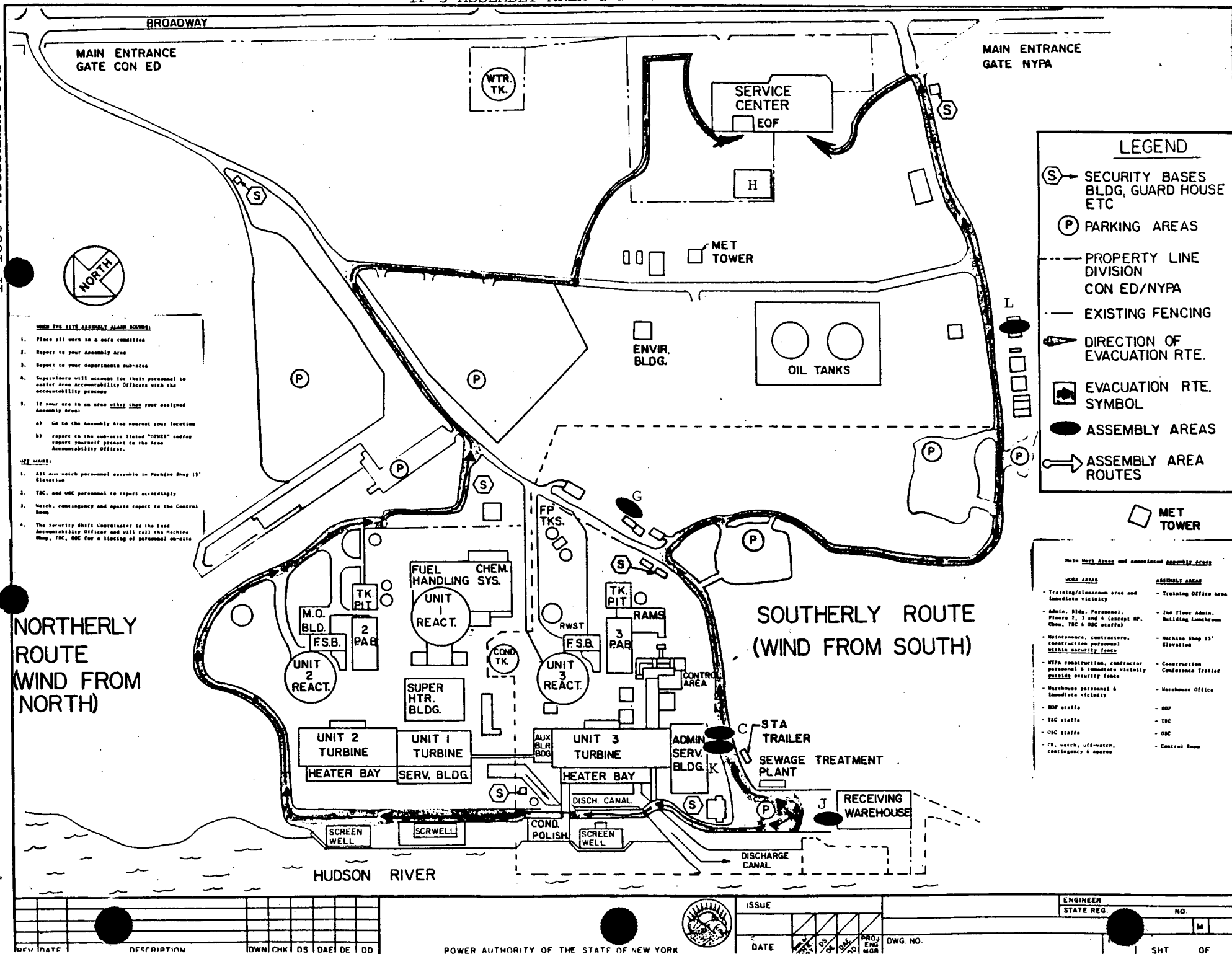
- 7.2 Prior to leaving the Con Edison Service Center, personnel and vehicles should be re-checked for contamination.

8.0 ATTACHMENTS

8.1 Assembly Area and Evacuation Route Map

8.2 Accountability Telephone Listing

IP-3 ASSEMBLY AREA & EVACUATION ROUTES



ACCOUNTABILITY

| <u>ACCOUNTABILITY AREA</u> | <u>DELEGATE</u> | <u>OFFICE EXTENSION</u> | <u>ASSEMBLY AREA EXTENSION</u> |
|--|--|-----------------------------|--|
| L Training | Marianna Sherman Andree Christman | [REDACTED] | [REDACTED] |
| J Warehouse | David DiCioccio Lou Tiberi Stefanie Wyskida | [REDACTED] | [REDACTED] |
| K Administration | Jill Choma Jim Reagan George Nickalatos Marianne Tansky | [REDACTED] | [REDACTED] |
| C Machine Shop | Jim Butler Mike Devlin Bruce Witherall | [REDACTED] | [REDACTED] |
| G Construction Conference Trailer | Steve Guarnaccia Ronald Mackowiak Marie Campanaro | [REDACTED] | [REDACTED] |
| Control Room | | [REDACTED] | [REDACTED] |
| TSC | Jean Moretti Ed Noel Al Froebrich | [REDACTED] | [REDACTED] |
| OSC | Anthony Vitale Cliff Marks Ervin Wilson Bob Shene | [REDACTED] | [REDACTED] |
| EOF | Diane Barton Laura Eagens Pam Walsh | [REDACTED] | [REDACTED] |
| H Con Edison Service Center (West Storeroom Area) | | [REDACTED] | |

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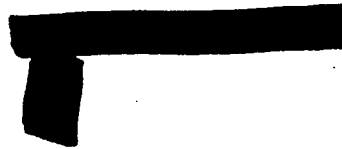
TELEPHONE EXTENSIONS

Unit 3 Control Room and Page
Unit 2 Control Room (Con Edison)
Shift Supervisor's Office
Operations Superintendent Office
Security Shift Coordinator
Security Building Extensions
Con Edison LAO
NVC
Westinghouse (Ray Heisey)
OSC
TSC
EOF (Emergency Director)



Lead Accountability Officer (Normal Working Hours)

Ruthanne Bowman
Sal Golemi
Christine Metzger
Margaret Saladino



Lead Accountability Officer (Off Hours)

Security



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