123 Main Street White Plains, New Yor 914 681.6240



May 18, 1988 IPN-88-019 John C. Brons Executive Vice President Nuclear Generation

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-137 Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant Docket No. 50-286 GL 83-28: Item 2.2.1 (TAC #M53681) Implementation of the Master Equipment List

Reference:

- Letter from Mr. J.D. Neighbors (NRC) to Mr. J.C. Brons (NYPA), " Generic Letter 83-28, Item 2.2 (Part 1)," dated April 13, 1988.
- Letter from Mr. J.C. Brons to Director, NRR, "Equipment Classification and Vendor Interface," dated August 25, 1986.

Dear Sir:

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Reference (1) requested additional information regarding the Authority's equipment classification program at Indian Point 3. Attachment 1 to this letter addresses the specific requests itemized in Reference (1). Reference (2) was not included in the list of Authority responses to equipment classification reviewed by the NRC Staff in Reference (1). For continuity purposes, it is discussed briefly below.

As discussed in Reference (2), the Authority has initiated a comprehensive Master Equipment List (MEL) in lieu of the more limited component classification list noted in prior responses. Reference (2) committed to implement a Reactor Protection System (RPS) component list by January, 1987 and reference it in procedures affecting safety related activities. This has been accomplished by review and approval of the RPS portion of the MEL and establishment of a procedure to maintain and update this RPS list. Reference to this list has been incorporated into site administrative

procedures controlling maintenance, testing, modification and classification of plant equipment. Reference (2) also committed to completing the component classification of all other safety related systems (Q-list) in the MEL by April, 1987 and providing a schedule for implementation thereafter. This list was compiled as scheduled and the Authority is in the process of clearing discrepancies identified during its compilation.

A procedure for validating the safety classification of each component in the MEL has been implemented. Validation of the safety classification portion of the MEL (Q-list) is anticipated by November 1, 1988. Following validation, use of the Q-list portion of the MEL for all other safety related systems will be incorporated in appropriate procedures.

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

Very truly yours,

John C. Brons Executive Vice President Nuclear Generation

cc: U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

> Resident Inspector's Office Indian Point Unit 3 U.S. Nuclear Regulatory Commission P.O. Box 337 Buchanan, N.Y. 10511

Joseph D. Neighbors, Sr. Proj. Mgr. Project Directorate I-1 Division of Reactor Projects I/II U.S. Nuclear Regulatory Commission Mail Stop 14B2 Washington, D.C. 20555

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR GENERIC LETTER 83-28, ITEM 2.2.1

Item 2.2.1.1 - Program

ITEM REQUEST:

Licensee should submit a program description which provides assurance that safety related components are designated as safety related on plant documents, drawings, procedures, and information handling systems that are used in accomplishing safety related activities such as work orders for repair, maintenance, and surveillance testing and orders for procurement of replacement parts.

RESPONSE:

The Indian Point 3 Administrative Procedures (APs) direct the performance of both safety and non-safety related activities affecting administration, operation, maintenance and engineering at the site. When initiating a work order or modification package, the safety category of the system or component involved must be marked on the appropriate forms controlled by the APs. Classification is determined from the definition of safety related (Category I) and the established list of Category I systems. There is no need to designate individual manuals, drawings or procedures as safety related as all activities affecting safety related systems, structures or components are controlled through the APs which require a determination and documentation of safety category where appropriate to ensure necessary quality requirements are met.

Item 2.2.1.2 - Information Handling Systems

ITEM REQUEST:

The licensee should confirm that the program for equipment classification includes an information handling system that is used to identify safety related components. The response should confirm that this information handling system includes a list of safety related equipment and that procedures exist which govern its development and validation.

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ADDITIONAL REQUEST:

Accordingly, since the licensee indicates they are preparing a single listing of safety related components they should submit a description of that effort and its product, together with confirmation that the new listing has been completed and is implemented.

RESPONSE:

The single listing of safety related components for classification use referred to by the NRC staff is contained within the Q-list portion of the MEL at Indian Point 3. The MEL now consists of over 40,000 components. It is being maintained and added to continuously by an on site project The Authority's goal is to establish MEL as a group. computerized component records management system that forms an integral part of a central overall site information The MEL as currently structured, not only identifies system. safety classification, but each component entry has over 200 data fields which include component identification, description, location, drawing numbers, material history, modifications, test requirements, design specifications and other information useful in meeting regulatory and operational requirements.

In order to implement the Q-list for classification use, two preliminary steps have to be accomplished. First, the MEL database should be transferred from a personal computer based system to a multi-user computer networking system. Second, the Q-list validation expected by November 1, 1988, must be completed.

Item 2.2.1.3 - Use of Equipment listing

ITEM REQUEST:

The licensee should confirm that their program for equipment classification includes criteria and procedures which govern how station personnel use the equipment classification information handling system to determine that an activity is safety related and to select appropriate procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, that apply to these safety related components.

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ADDITIONAL REQUEST:

The licensee should address how personnel are directed to use the equipment classification information handling system to determine the appropriate procedures for the accomplishment of design changes, performance of engineering support work, the accomplishment of setpoint changes and in the performance of special tests and studies.

RESPONSE:

Design changes, engineering support work, setpoint changes and special tests/studies are initiated through a plant AP request for engineering services. The final implementation of these activities are controlled through plant APs regardless of whether the initial work is performed by an offsite or plant organization. To assure the appropriate Appendix B requirements are applied, the APs require a determination of whether or not the affected equipment is safety related or not.

Currently the determination of safety classification is done through review of a system-level list of Category I equipment and the definition of Category I, itself. When implemented, the Q-list will provide this determination of classification down to the component level. The APs will continue to direct personnel to the appropriate AP procedure/form to ensure that the safety classification of an item is determined such that activities affecting safety related equipment will satisfy the requirements of Appendix B to 10 CFR 50. **Indian Point 3** Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511 914 739.8200



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DISTRIBUTION OF THE INDIAN POINT #3 EMERGENCY PLAN REVISIONS SUBJECT:

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 Renee' Welsh, Emergency Planning Department.

EMERGENCY PLAN VOLUME I ----

OLD:

NEW:

NEW:

ROSTER I - May 1988

ROSTER II - May 1988

VOLUME II - EMERGENCY RESPONSE ACTIVATION

OLD:

ROSTER I - Jan. 1988

ROSTER II - Jan. 1988

VOLUME III -EMERGENCY PLAN IMPLEMENTING PROCEDURES

OLD:

NEW:

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

(Signature)

(Date)

Enclosures

4045 1

APPENDIX A

ROSTER II

OFF-HOURS PERSONNEL CALL-IN LIST

MANDATORY OFF-HOURS CALL-IN: Α.

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MESSAGE:
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This is

Name from IP-3. A emergency is in progress. You are requested to report to the Site as soon as possible.

The following people must be notified of the emergency. Keep calling or page them until they receive the message that an emergency is in progress. PLEASE NOTE THAT ALL AREA CODES ARE (914), UNLESS OTHERWISE INDICATED.

	Report To:	Home #	Beeper #
Mimoz, Steve	TSC	297–7041	683-9165
Perrotta, Joe	EOF	628–1853	683-9200
Vignola, Joe	OSC	526–2557	683-7718
Albright, Marty	OSC	297–8568	683-9021
Hahn, John	SEC	693–4566	683-9154

в.

OFF-HOURS ON-CALL LIST: Call "2" from each group (making voice contact, returning to busy numbers later). Return to the top of the list and continue to call 2 people from each group until all persons have been contacted. Personnel should be informed that an emergency is in progress and where to report.

H.P. (OSC)		Beeper #	Performance (TSC)		Beeper #
Deschamps, Bob LaVera, Ron Saunders, Paul Milewski, Dan	297-4133 297-7320 298-8642 265-4098 424-3155	683-9120	Catano, John DeAntonio, Nick Celentano, Dennis Scalone, Ray	226-6984 631-6559 897-2464 297-1899	
Jim Barry Chemistry (OSC) Kerns, Matt	265–2460 462–5806 528–6145		EOF Staff (EOF or AEOF) — Diamond, Ed — Hamlin, Bill — Davis, Jim — Chaubard, Mary Ann Eagens, Laura	831–5187 297–0237 896–5296 446–0904 528–5489	683–7804
Sandike, Steve	565-0609 739-7482)F)	Ray, Brian McGuiness, S. Hafner, Lori Schivera, John LePere, John	223–5637 628–3251 297–0710 562–1764 279–2366	·
Gillen, Jim Labenski, Tom Peckham, Mike Mayer, Don	226-8204 226-4635 297-6114 562-1104 297-3067 962-5423	683–9256 683–9147 792–5225	Maintenance (OSC) Vitale, Tony Arcate, Jack Carano, Bill DiChiara, Joe Colwell, Renis	332–8534 631–5189 528–1816 297–8589 897–4498	683–9082
<u>1&C</u> (OSC)			Dockstader, Garth Pulcher, Tom	297–4432 896–6977	683-4532
Daly, David	297–6185 462–7607 226–8608 226–8918		Radwaste (OSC) Greenman, Bill	225-1065	
Operations (OSC)			Operations (Control Room		
	831–6139 739–7532		Armando, Ed Hansler, Bob Holdam, Jim Sporbert, Dick	838–1076 424–4105 265–3954 265–2156	\backslash
	221-0703 462-0673 737-2113 737-3349 485-7406	683–4102 683–4109	TSC/OSC Staff Baxter, Jean Moretti, Jean Dufrain, Renee Salerno, Cathy	737–0642 528–5007 297–0368 226–8616	
Anderson, John Grogan, Helen Kelly, Jacqueline Tedesco, Carmine Froebrich, Al	227–5339 739–4103 (203) 454 739–6680	7260	Technical Liasons Embry, Charles Davis, Steve Young, Brian Vehstedt, Ken Comiotes, Jim	896-8546 225-7431 245-6247 739-0105 248-7325	

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 739.8200



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VOLUME	I	-	EMERGENCY	PLAN		
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OLD:						

VOLUME II - EMERGENCY RESPONSE ACTIVATION

OLD:

SUBJECT:

VOLUME III -	EMERGENCY	PLAN	IMPLEMENTING	PROCEDURES	
<u>OLD</u> :				<u>NEW</u> :	
INDEX 49				INDEX	50
IP-1076, REV.	8			IP-107	6, REV.9

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

(Date) (Signature)

Enclosures