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New York Power Authority

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Executive Vice President
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March 26, 1993
IPN-93-015

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: Indian Point Unit 3 Nuclear Power Plant
Docket No. 50-286
Action Plans Regarding The Performance Improvement Outage

Dear Mr. Martin:

This letter provides a summary of activities that have recently taken place at Indian Point 3 and led to the decision by the Authority to place the plant in cold shutdown. It also includes summaries of the action plans that we have established to improve our performance.

In February 1993, while responding to questions by the NRC staff, the Authority investigated the capabilities of the Anticipated Transients Without Scram (ATWS) Mitigation System Actuation Circuitry (AMSAC) system. On February 26, 1993, the Authority determined that the Indian Point Unit 3 AMSAC system did not comply with the requirements of 10 CFR 50.62, and began a controlled reactor shutdown. On February 27, 1993 the plant was at hot shutdown. The plant was brought to cold shutdown on March 7, 1993, in order to address programmatic weaknesses in the calibration program, as well as specific problems with the AMSAC system.

As a result of the findings from the review of the surveillance testing program and commitments, a broad-based review of many programs was initiated. Individual action plans have been developed for each of the programs to be reviewed; they are summarized in Attachment I. The Authority will complete the majority of the tasks in the action plans prior to startup. The Performance Improvement Plan (PIP) is being used as the vehicle for controlling these action plans. The critical path for the current outage will be the resolution of these programmatic weaknesses.

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In addition, on March 19, 1993 during reactor coolant system drain down to test the second level indication system, operators inappropriately isolated the first level indication system. And inappropriately, the clearance for reactor coolant pump seal work was issued and work commenced prior to establishing the operability of the second level indication system. Due to the seriousness of this event, all outage work was stopped until a verification that the proper controls are being applied for work activities.

It is clear that there is a need to improve the Authority's ability to assess the adequacy of our programs and processes. Prior to resuming power operation, the necessary revisions and changes to existing programs to improve our assessment capability will be made.

The plant is currently at cold shutdown, and the Authority will not restart the plant until we are satisfied with restart readiness and until the NRC agrees with my conclusion. The Authority does not expect startup before mid-May.

If you have any questions, please contact me.

Very truly yours,

Ralph E. Beedle

Attachment

cc: U.S. Nuclear Regulatory Commission (original)
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ATTACHMENT I

SUMMARY OF ACTION PLANS FOR THE
PERFORMANCE IMPROVEMENT OUTAGE

I. Assurance of Compliance

Note: These action items will be completed prior to startup.

- Prior to startup, the Authority will verify that the AMSAC system meets the requirements of the ATWS Rule (10 CFR 50.62) and will verify the system is operable.

- Identify safety significant systems (AMSAC, Appendix R alternate shutdown equipment, Qualified Safety Parameter Display System (QSPDS), Regulatory Guide 1.97 components), that are not governed by technical specifications and verify that they comply with NYPA's commitments for meeting NRC requirements.

- Implement Administrative Operational Specifications for AMSAC, Appendix R alternate shutdown equipment, and QSPDS.

- Review documentation and commitments for periodic instrumentation calibration to identify any deficiencies in the existing calibration programs. Identify any instruments that must be calibrated prior to station startup and calibrate them.

- Conduct an audit, based on statistical sampling, of the Design Basis Licensing Data Base to identify all commitments in the sample and assure that these commitments have been met or are on a schedule for closure.

II. Resolution of Open Issues

Note: These action items will be completed prior to startup.

- Reevaluate the acceptability of the last Boric Acid transfer pump test by reviewing past and present surveillance tests and system line-ups.

- Reevaluate the full operability of the Auxiliary Feedwater System (AFWS) by: performing a walkdown of the system, reviewing the most recent surveillance tests and systems manager's report, and addressing the concerns and deficiencies identified in NRC Inspection Report No. 50-286/92-28.

- Verify that the AMSAC relays are within the manufacturer's service life.

- Verify that the backup power supply (i.e., Technical Services Center Diesel) to the AMSAC is not affected by the unavailability of the plant computer uninterruptible power supply batteries.

II. Resolution of Open Issues (cont'd) Note: These action items will be completed prior to startup.

- Perform an independent review of all System Manager Reports. Assure that no potential operability concerns were overlooked and identify issues that need to be resolved prior to restart.
- Review QA generated CARs (Corrective Action Reports), audit findings, and RECs (Recommendations) to determine issues that need to be resolved prior to startup.
- Review the temporary modifications list for any items that require resolution prior to startup based on age and significance.
- Review the Operations Experience Review Group (OERG) pending and open recommendation files for issues that should be completed/resolved prior to startup.
- Require vendors that perform maintenance services, including I&C services, to use only Authority approved procedures and meet Authority documentation requirements.
- Review all Plant Operational Review Committee/Safety Review Committee (PORC/SRC) open items and identify items that must be completed prior to startup.
- Ensure that there are no overdue biennial reviews of station procedures.

III. Program Improvements

Note: We have developed the following action plans that have both long term and startup tasks. We will communicate the status of the startup tasks to the NRC Resident Inspector on a weekly basis.

- Improve the surveillance test program.
- Improve the program for prerequisite controls for plant mode changes.
- Verify that there are no overdue preventive maintenance (PM) items in the IP3 preventive maintenance program that have not been evaluated for extension. Review the scope of our program to incorporate good practices from other industry sources.

III. Program Improvements (cont'd)

Note: We have developed the following action plans that have both long term and startup tasks. We will communicate the status of the startup tasks to the NRC Resident Inspector on a weekly basis.

- Implement a relay PM program (i.e., cleaning and periodic replacement of relays).
- Improve the procedural guidance for system engineers' responsibilities and qualification/training and implement the system engineer program.
- Improve the conduct of post outage startup training for licensed operators.
- Improve the fact finding process for investigating plant events to better determine root cause and improve corrective actions.
- Review and revise the process for implementing Operational Experience Review Group corrective actions to ensure timely resolution.
- Improve the retest program; include modification acceptance testing. Incorporate lessons learned from the surveillance program performance improvement action plan.
- Track all outage work (including all items that must be complete prior to startup) using the Reliable Online Maintenance Environment (ROME) work management system. This will ensure PIP items are within the work management system for plant mode changes.

IV. Organizational Improvements

Note: We have developed the following action plans that have both long term and startup tasks. We will communicate the status of the startup tasks to the NRC Resident Inspector on a weekly basis.

- Review the roles and responsibilities of Site Engineering and Technical Services. Revise or develop procedures such that each group's responsibilities are clearly defined.
- Improve management oversight of the Operations department. Formalize departmental communications.
- Implement a Performance Improvement Plan for the Planning and Scheduling Department. Complete departmental efforts to proceduralize all administration processes.