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IPN-93-070

U.S. Nuclear Regulatory Commission
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Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Retraction of Commitment Made in Licensee
Event Report LER 81-008/01T-0

Reference: 1) Licensee Event Report LER 81-008/01T-0 transmitted via letter from the Power Authority of the State of New York to the Commission and dated November 23, 1981 (Letter IP-FWG-15538).

Dear Sir:

This letter serves to notify the Commission of the Authority's retraction of a commitment made in LER 81-008/01T-0 which was submitted via Reference 1.

The corrective action (commitment) involved adding a routine surveillance of valve position and pressure for Weld Channel and Containment Penetration Pressurization (WCCPP) system racks 12 and 13 on the conventional side Nuclear Plant Operator (NPO) logsheet.

Attachment 1 provides details involved with this issue and provides the discussion which shows that administrative controls improvements have made it unnecessary to continue performing the subject surveillances. Attachment 2 clearly identifies the commitment which has been retracted.

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Should you have any questions regarding this matter please contact Mr. John Jordan at (914) 736-8205.

Very truly yours,

John H Garrity

John H. Garrity
Resident Manager
Indian Point Three Nuclear Power Plant

jhg/fp

Attachments: as stated

cc: Mr. Thomas T. Martin
Regional Administrator
Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
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INPO Records Center
700 Galleria Parkway
Atlanta, Georgia 30339-5957

BACKGROUND

Licensee Event Report LER 81-008/01T-0 reported that on November 9, 1981, it was observed that two manual isolation valves on the Weld Channel and Containment Penetration Pressurization (WCCPP) system were improperly left in the closed position after maintenance on the WCCPP.

The cause of the event was determined to be an administrative error. Several valves were isolated and tagged for maintenance on the WCCPP as indicated on the operating order. Subsequently, it was determined that two additional valves were required to be closed. These two valves were isolated and tagged, but were inadvertently omitted from the operating order. Therefore, when the operating order was cleared, these valves remained closed. A corrective action taken to prevent the repetition of the event was to revise the internal procedures that controlled the tagging of equipment. Another corrective action taken to address this event required adding a routine surveillance of valve position and pressure for WCCPP racks 12 and 13 on the conventional side Nuclear Plant Operator (NPO) logsheet.

CURRENT ADMINISTRATIVE CONTROLS

Administrative procedure AP-10.1, "Operating Orders and Control of Stop Tags, Do Not Operate Tags and Locks" is currently in use to control the issuance of operating orders and the placement, addition, and removal of tags that are required by the issuance of an operating order. This procedure indicates that operating orders are computer generated and when work is complete, the computer generates an operating order form to remove in duplicate. If the computer system were to become unavailable, the subject procedure requires that any hand written operating order be entered into the computer so that the computer will generate an operating order once the computer is restored. If tags are required to be added or removed from an existing operating order, the procedure requires that the tags be documented on the original operating order and requires that a new field copy of the operating order be generated by the computer. Therefore, the computer generated close out operating order will reflect the added or removed tag.

CURRENT ADMINISTRATIVE CONTROLS (Continued)

In addition to the procedural requirements described above, a system lineup control program is now in effect which requires a startup check off list to be performed on a system not maintained in the normal lineup following an outage. Administrative Procedure AP-21, "Conduct of Operations" establishes the policy which the operations department follows in the verification of equipment status during startup. This procedure indicates that the operations manager may require various system check off lists to be performed based on the scope and duration of the outage. Therefore, this procedural guidance currently assures that the appropriate check off lists are completed as an initial condition before proceeding with a system operating procedure. Had such a startup check off list been performed on the WCCPP system, back in 1981, this new program would have lined up the system correctly after maintenance.

CONCLUSION

Administrative controls improvements as described above have made it unnecessary to continue performing the mandated surveillances. Therefore, the conventional side NPO log has been revised to delete the routine surveillance. Revision 41 of the conventional NPO log, dated September 1992, was the last revision which included the surveillance of WCCPP racks 12 and 13. By removing these lineup checks from the conventional logsheet, the operator's time is more efficiently utilized to assure the safe and reliable operation of the plant.

COMMITMENT RETRACTED IN LETTER IPN-93-070

COMMITMENT NUMBER	DESCRIPTION
IPN-93-070-1	This letter serves to retract a commitment made in LER 81-008/01T-0 which was submitted via letter IP-FWG-15538 dated November 23, 1981. The commitment was one of the corrective actions required to address the event reported in the LER. The corrective action entailed adding a routine surveillance of valve position and pressure for WCCPP racks 12 and 13 on the conventional side Nuclear Plant Operator (NPO) logsheet.