POWER AUTHORITY OF THE STATE OF NEW YORK INDIAN POINT NO. 3 NUCLEAR POWER PLANT

P. O. BOX 215 BUCHANAN, N. Y. 10511

TELEPHONE: 914-739-8200



December 29, 1981 IP-JAS-15849

Mr. R. W. Starostecki, Director Division of Resident and Project Inspection Nuclear Regulatory Commission Region 1 631 Park Avenue King of Prussia, Pennsylvania 19406

Subject: Inspection 50-286/81-13

Dear Mr. Starostecki:

This letter responds to your Inspection Report No. 50-286/81-13 dated December 3, 1981 and received at this office on December 7, 1981.

Attachment I to this letter responds to Appendix A of your letter.

Very truly yours,

Resident Manager

JAS:ms

Attachment

cc: T. Kenny

Resident Inspector

SUBSCRIBED AND SWORN TO BEFORE ME THIS 22 DAY OF Secundes 1981.

RUTHANNE B. BOWMAN Notary Public, State of New York No. 4651904, Westchester County Commission Expires March 30, 1983

~ B. Bowma

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Violation

Technical Specification 3.3.D.1 states, "The reactor shall not be brought above the cold shutdown unless the electrical and mechanical penetrations and liner weld channels are continuously pressurized above 41 psig."

Contrary to the above, on November 9, 1981 at 1:35 p.m., the reactor was brought above cold shutdown with portions of the electrical penetrations at a pressure of 35 psig.

Response

Isolation valves to racks 12 and 13 in Zone 1 of the Containment Penetration and Weld Channel Pressurization System (CPWCPS) were closed with Stop Tags for maintenance while the reactor plant was in cold shutdown. The tags were added to an operating order after the original tags were placed on valves in the CPWCPS. The additional tags were never entered on the hold-off master sheet through error and contrary to normal practice. When the tag out was cleared the isolation valves for racks 12 and 13 remained shut and tagged. Prior to bringing the reactor above cold shutdown, step 3.6 of Procedure COL-RCP-1 instructs the operator to check the pressure of each zone in the CPWCPS to ensure pressure in each zone is above 41 psig. This step was performed using a pressure recorder in the control room which provides monitoring for zones, not individual racks, in the CPWCPS. Therefore, a portion of the system can be isolated and not identified in the control room.

Procedure COL-RCP-1 has been changed to ensure that CPWCPS racks which can be isolated without control room indication are checked locally prior to heating the plant above 200°F. The operating order procedure has been revised to include provisions that assure all tags are listed on the operating order form and that removal of tags must be verified in order to clear an operating order.

The new Operating Order procedure has been approved and will be implemented upon receipt of the new Operating Order forms. We have been advised by the printer that the new forms will be available the first week in January, 1982.

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