

Indian Point 3  
Nuclear Power Plant  
P.O. Box 215  
Buchanan, New York 10511  
914 736.8001



**New York Power  
Authority**

**Joseph E. Russell**  
Resident Manager

August 1, 1991  
IP3-91-041

Docket No. 50-286  
License No. DPR-64

Mr. Curtis J. Cowgill, Chief  
Reactor Projects Branch No. 1  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Subject: Inspection Report No. 50-286/91-09 and Associated  
Notice of Violation (91-09-03)

Dear Mr. Cowgill:

Attachment I to this letter provides the Authority's response to the Notice of Violation (91-09-03) enclosed with Inspection Report No. 50-286/91-09.

Should you or your staff have any questions concerning this matter, please contact Mr. M. Peckham of my staff.

Sincerely,

Joseph E. Russell  
Resident Manager  
Indian Point Unit 3  
Nuclear Power Plant

JER:BJR/rj

Attachment

cc: Document Control Desk (Original)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

*Handwritten initials: JER*

ATTACHMENT I  
REPLY TO A NOTICE OF VIOLATION  
91-09-03

VIOLATION:

10 CFR 50, Appendix B, Criterion XVI and NYPA's Quality Assurance Program dated July 23, 1984, require, in part, that measures shall be established to assure that all conditions adverse to quality are promptly identified and corrected.

Contrary to the above, measures were not established to assure that certain conditions adverse to quality were promptly identified and corrected as evidenced by the following examples:

1. NRC had previously identified, in March 1990, the absence of a program to evaluate inoperable emergency lighting with respect to Appendix R requirements. However, as of March 1991, actions had not been taken to identify and correct deficiencies related to inoperable emergency lighting required by 10 CFR 50, Appendix R, Section III.J in five areas supporting safe shutdown activities, specifically, the charging pump cell, the component cooling water area, the auxiliary boiler feed pump room, the Appendix R diesel generator control panel and the emergency diesel generator building fan room.
2. Between 1986 and 1989, the licensee had identified a number of fire protection deficiencies, including the lack of a formalized training program for fire watches while performing hot-work, and the lack of identification of safety areas for Appendix R emergency lighting. However, as of April 1991, as identified in NYPA's QA audit 90-42, the triennial audit findings from past years were not properly addressed.

This is a Severity Level IV violation (Supplement I).

RESPONSE:

The Authority has reviewed the notice of violation outlined in Attachment A of NRC Inspection Report 91-09 and agrees that the violation occurred as described and recognizes the need for continuing improvement in prompt resolution of deficiencies.

An improved commitment tracking/reporting program has been implemented at Indian Point 3. The comprehensive on-line report notifies station department heads, general managers, and the resident manager of unresolved corrective action items weekly. The previous system provided quarterly reports and contained superfluous information.

The Indian Point 3 Quality Assurance Department has updated reporting of corrective action requests, findings and recommendations to include all site QA corrective action items. Previous reports did not track corporate office findings (for example, the items associated with paragraph number 2 above).

Three general manager positions have been created to oversee the station's activities and report to the resident manager. These managers receive the described reports and have been taking action to ensure prompt corrective actions.

The two new reporting programs and general managers initiatives are improving the timeliness of resolving corrective action items and should prevent a recurrence of the violation.

The Authority has reviewed the details of the examples of the violation and provided the following corrective actions:

- 1) Performance test 3PT-Q37, Emergency Lighting System Test, was revised to include:
  - o a requirement for an engineering evaluation of emergency lighting failures, in order to determine the effect of any failure on Appendix R requirements.
  - o a requirement for the issuance of a priority 2A work request for repair within seven calendar days for units necessary for safe shutdowns.
- 2) The inoperable or deficient lighting units identified by the NRC inspector were repaired and returned to service.
- 3) A formalized training program for fire watch personnel has been implemented and training of plant personnel assigned hot-work duties will be completed by September 30, 1991.
- 4) The Indian Point 3 Fire Protection Reference Manual has been completed. The manual provides a consolidated description of the fire protection features of the Indian Point 3 plant, including identification of the safety areas for Appendix R emergency lighting.