

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

Joseph E. Russell
Resident Manager

April 17, 1992
IP3-NRC-92-023

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

Mr. James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission Region 1
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection No. 50-286/91-26 and Associated Notice
of Violation

Dear Mr. Joyner:

This letter and Attachment I provides the Authority's response to Inspection Report No. 50-286/91-26 and the Notice of Violation.

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

Sincerely,

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

jer/bjr/rj
Attachment

cc: Document Control Desk (original)
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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

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ATTACHMENT I

RESPONSE TO VIOLATION
91-26

VIOLATION:

10 CFR Part 50 Appendix B, Criterion II, Quality Assurance Program, requires, in part, that the quality assurance program shall provide control over activities affecting the quality of systems and components, to an extent consistent with their importance to safety.

Contrary to the above, as of December 16, 1991, the licensee did not provide control over activities affecting the quality of systems and components, to an extent consistent with their importance to safety. Specifically, the licensee failed to assure control of the position of the automatic voltage control rheostat for emergency diesel generator (EDG) 33, a safety-related system. On December 16, 1991, it was found to be incorrectly positioned in that it was set at 430 volts rather than the required setting of 480 volts.

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

RESPONSE:

NYP&A agrees with Violation A described in the Notice of Violation dated March 10, 1992.

The reason for the violation was incorrect positioning of the automatic voltage control rheostat located on the local EDG control panel. A thorough investigation did not identify the cause of the incorrect positioning.

The following corrective actions have been completed and are proving effective in maintaining control over the position of the rheostat:

- * The rheostat was immediately positioned correctly.
- * A thorough investigation was conducted.
- * Reference marks were added to all three EDG panels to clearly identify the operable band on the automatic voltage control rheostat.
- * The nuclear plant operators are required to verify and log that the automatic voltage control rheostats on all EDG panels are within the operable band every shift.

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- * A surveillance procedure has been implemented for technical specification compensatory operability verification of the EDGs. This procedure documents acceptance criteria and required step signoffs.
- * A restoration checkoff list.
- * Plant safety system walkdowns were conducted to identify controlling devices that would be suspect to mispositioning due to inadvertent impact. The assessment considered devices that would result in operators not being cognizant of the mispositioning. None were identified.
- * The IP3 General Employee Training program, which is provided to all unescorted personnel, was reviewed. The lesson plan addresses that only qualified personnel manipulate controls at IP3.
- * Surveillance tests, requiring initialing of procedure steps and formal acceptance criteria, are being used for all Technical Specification equipment operability verifications. A Technical Specification amendment is being initiated to use previous surveillance tests to verify operability.

The following additional corrective action is planned:

- * A protective shield for the EDG rheostat dial will be installed.

Full compliance was achieved immediately upon finding the deficiencies.

VIOLATION:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972 (Safety Guide 33.), Regulatory Guide 1.33, November 1972, Appendix A, Section H, Procedure for Control of Measuring and Test Equipment, requires, in part, that specific procedures for surveillance tests, should be written (implementing procedures are required for each surveillance test listed in a technical specification) for Emergency Power Tests.

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Technical Specification 3.7.B.1 requires that one diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 72 hours provided the 138KV and the 13.8KV sources of offsite power are available and the remaining diesel generators are tested daily to ensure operability and the engineered safety features associated with these diesel generator buses are operable.

Contrary to the above, as of December 16, 1991, the licensee did not have a written test procedure in order to conduct the surveillance tests on the emergency diesel generators required by Technical Specification 3.7.B.1.

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

RESPONSE:

The Authority agrees with Violation B described in the Notice of Violation dated March 10, 1992.

The reason for the violation was inadequate controls of the diesel generator operability tests.

IP3 performed operability checks using a system operating procedure and logging the event. The process lacked signature or initial blanks for each step and formalized acceptance criteria.

A procedure requiring initialing of procedure steps and formal acceptance criteria evaluation was implemented on February 3, 1992 and is effective.

Surveillance tests, requiring initialing of procedure steps and formal acceptance criteria evaluation, are being used for all Technical Specification equipment operability verifications. A Technical Specification amendment is being initiated to use previous surveillance tests to verify operability. Full compliance was achieved on February 3, 1992.

VIOLATION:

10 CFR Part 50, Appendix B, Criterion XI, Test Control, requires, in part, that test results be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, on November 13, 1991, the test results for PT-V16, Diesel Generator Monthly Functional Test, were not adequately evaluated to assure that the test requirements associated with the differential pressure between the essential

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service water header and service water inlet pressure to diesel generator 31 heat exchanger were met. Specifically, PT-V16 specified an acceptance criteria of at least 10 psid, and a test result of only 9 psid was obtained. This discrepancy was not noted by the operations manager or the performance and reliability supervisor during their review of the completed surveillance test data.

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

RESPONSE:

The Authority agrees with Violation C described in the Notice of Violation dated March 10, 1992.

The cause of the event was cognitive personnel errors by a non-licensed operator and a performance technical specialist. The non-licensed operator identified acceptable performance without meeting the criteria. The performance technical specialist did not identify the error in the review.

The Operations Manager reviews surveillance tests to ensure corrective actions are being accomplished for systems/components identified as unacceptable. As the item was identified as acceptable no corrective actions were described.

The non-licensed operator and performance technical specialist have been advised of the event.

Formal changes to surveillance procedures are planned during biennial review updates to improve efficiency of the review process.

The value of the parameter that did not meet the acceptance criteria has been assessed as not imparting the operability of the component.

The value of the parameter (9 psid) on November 13, 1991 has been reviewed as not affecting the operability of the component.

The Authority is in full compliance