

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

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IP3-NRC-92-061

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

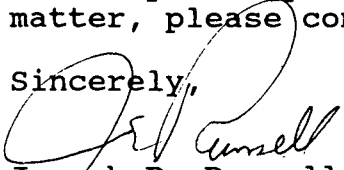
Mr. Lee H. Bettenhausen, Chief
Operations Branch
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Bettenhausen:

Attachment I to this letter provides the Authority's response to the Notice of Violation (92-14-03) enclosed with Inspection Report No. 50-286/92-14.

Should you or your staff have any questions concerning this matter, please contact Mr. M. Peckham at 914-736-8041.

Sincerely,


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

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Attachment

cc: Document Control Desk (Original)
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Washington, D.C. 20555

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**Attachment I
Response To Violation
92-14-03**

VIOLATION

During an NRC Inspection conducted from June 1 - 5, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy((1992)), the following violation was identified:

10 CFR 50, Appendix R, Section III.J. "Emergency Lighting, "requires emergency lighting units with at least 8-hour battery power supply for operation of safe shutdown equipment and for access and egress routes to the equipment.

Contrary to the above on June 3, 1992, two areas were identified without the required 8-hour emergency lighting necessary for an operator to implement the safe shutdown functions delineated in the alternate safe shutdown procedure ONOP-FP-1A, revision 7, "Safe Shutdown From Outside the Control Room," as follows:

1. Turbine Building, Elevation 15'0", Boiler Feed Pump Area
2. Turbine Building, Elevation 33'0", Access route to the reactor trip breakers via door number 203.

This is a Severity Level IV Violation, Supplement I.

RESPONSE

The Authority has reviewed the Notice of Violation outlined in Appendix A of NRC Inspection Report 92-14 and disagrees with the violation.

The emergency battery lighting assessment completed in compliance with Appendix R does not identify a need for emergency lighting in the Boiler Feed Pump area or access area to door number 203.

The Main Boiler Feed Pumps are not needed to support safe shutdown operation.

ONOP-FP-1A revision 7 directs Main Boiler Feed Pump shutdown as an action subsequent to reactor shutdown (trip). Emergency battery lighting exists in the control room and the Auxiliary Boiler Feed Pump Building at the main steam isolation valve area to provide feed pump shutdown capability. The feed pumps are steam driven and closure of the main steam isolation valves ensures pump shutdown.

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ONOP-FP-1A revision 7 directs an independent verification of main feed pump shutdown locally as a supplement to these actions.

ONOP-FP-1A revision 7 requires a reactor shutdown (trip). Three redundant methods are described in the procedure for opening the reactor trip breakers from control room and subsequent reactor shutdown (trip). The control room is provided with emergency battery lighting.

ONOP-FP-1A revision 7 directs an independent verification of the reactor trip breaker status locally.

The access route to the reactor trip breakers via door number 203 is not the most direct pathway from the control room to the reactor trip breakers. The most direct pathway, and the one defined by the Appendix R analysis, is provided with emergency battery lighting. This pathway is the control room "back" stairwell.

The independent verification of reactor trip breaker status and main feed pump status enhances our program. The Authority recognizes a need to provide greater operator flexibility in the performance of these tasks. The following actions are planned:

- The Authority will install emergency battery lighting at the Main Boiler Feed Pumps and the access area to door 203 by March 1, 1993.
- Complete a design review of installed emergency battery lighting units and operator pathways necessary to support Appendix R Section III.J and BTP9.5-1 Appendix A by December 31, 1992. If deficiencies are identified, they will be resolved by March 1, 1993.

The Authority is in full compliance.