

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

October 26, 1992
IP3-NRC-92-079

License No. 50-286
Docket 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

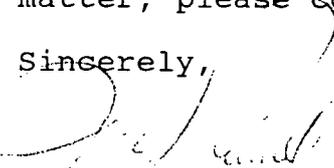
Subject: **Reply to Notice of Violation From Inspection
Report No. 50-286/92-22: Notices of Violation 92-
22-02 and 92-22-03**

Dear Mr. Cowgill:

Attachment I to this letter provides the Authority's responses to the Notices of Violation (92-22-02 and 92-22-03) enclosed with Inspection Report 50-286/92-22.

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

Sincerely,


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

jer/do/rj
Attachment

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9210290400 921026
PDR ADDCK 05000286
Q PDR

JE Russell

cc: U.S. Nuclear Regulatory Commission (original)
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

IP3 Resident Inspector
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, New York 10511

ATTACHMENT I
RESPONSE TO VIOLATIONS 92-22-02 AND 92-22-03

Violation

Indian Point 3's Technical Specification 6.8.1 requires written procedures to be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, November 1972.

Regulatory Guide 1.33, Appendix A, November 1972, states that equipment control activities should be covered by written administrative procedures.

Indian Point 3's administrative procedure AP-13, "Temporary Modification Procedure", requires the permission of the General Manager of Operations prior to the installation of a temporary modification which improves plant safety in an emergency situation. In this case, the conditions under which the temporary modification was installed will be reviewed by the Plant Operations Review Committee (PORC) the next working day. A written safety evaluation must be prepared and review/approval granted by PORC within 14 days of installation.

Contrary to the above, on June 10, 1992, the operating staff installed a lower rated breaker in MCC 34, upon completion of an initial evaluation, without the approval of the General Manager of Operations in order to restore power to the auxiliaries of 31 emergency diesel generator. Additionally, the temporary modification process was not initiated, resulting in failure of PORC to review the modification and the evaluation the following day.

This is a Severity Level IV Violation (Supplement 1).

Response

NYPA agrees with the Notice of Violation.

On July 10, 1992, prompt corrective actions were taken by the operating staff to restore plant safety. Included in these corrective actions were stripping the loads from MCC 34 and reclosing the breaker. The breaker again tripped on overcurrent. The breaker was racked out and removed from the cubicle. Phase to ground and phase to phase resistance checks were performed on the load side stabs. All phases were satisfactory. The shift supervisor substituted a breaker from MCC 35 and minimized loads on MCC 34 and restored power to the emergency diesel generator auxiliaries.

The reason for the violation was a failure of the plant staff to properly categorize the configuration change involving the circuit breaker replacement as a temporary modification. The shift supervisor did not recognize that his actions to promptly restore 31 emergency diesel generator to service constituted a

ATTACHMENT I
RESPONSE TO VIOLATIONS 92-22-02 AND 92-22-03

violation of AP-13. The approval to proceed should have been obtained and a temporary modification prepared.

Corrective actions being taken to prevent recurrence follow:

By December 1, 1992, a revision will be completed to AP-13 identifying the replacement of circuit breakers with different amptector settings or ratings as a temporary modification.

All shift supervisors have been counseled on this event.

The procedure revision will be communicated to personnel having responsibilities for temporary modifications.

A breaker with original plant amptector settings was installed on June 11, 1992.

The Authority was in full compliance on June 11, 1992.

Violation

10CFR50, Appendix B, Criterion III, "Design Control", requires measures to be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems, and components.

Contrary to the above, NYPA did not adequately review the selection of replacement battery cells for 31 and 32 station batteries for suitability. The review of the station battery modification failed to ensure that the replacement cells were seismically qualified, as required by the FSAR and Technical Services Specification TS-ES-015.

This is a Severity Level IV Violation (Supplement 1).

Response

NYPA agrees with the Notice of Violation.

The reason for the violation was a personnel error by a staff engineer in interpreting the requirements of IEEE-535, "Standard for Qualification of Class 1E Lead Storage Batteries for Nuclear Power Generating Stations".

Inadequate reviews by Technical Services staff members contributed to the error. This error was discovered by the corporate Quality Assurance Department during an audit of design change packages for the recently completed refueling outage.

Corrective actions being taken to prevent recurrence follow:

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A Reasonable Assurance of Safety, RAS 92-3-188 DCPWR, was written and approved on August 13, 1992 which concluded that the Exide GC-33 battery cells installed in 31 and 32 station batteries will perform their intended function, i.e., remain operable both during and after the earthquake equivalent to the Design Basis Earthquake (DBE).

Exide GC-33 battery cells have been procured and sent to Wyle Laboratories for seismic qualification testing to confirm the conclusions made in the Reasonable Assurance of Safety.

The Technical Services staff members involved with the development and review of this modification have been counseled regarding the need for thorough research and review during the development of design change packages.

An additional sample of commercial dedication and modification packages beyond the sample previously reviewed by the corporate Quality Assurance Department will be reviewed for adequacy including seismic qualification by January 30, 1993. This audit sample will include approximately 150 packages and will be conducted by the corporate Quality Assurance Department.

The engineering organization at Indian Point 3 has been reorganized into two onsite engineering groups. A new organization known as the Site Engineering Department will be responsible for the preparation, review and approval of design change packages. The Technical Services Department will be responsible for overall system engineering management through the creation and assignment of system engineers to plant systems. This effort has resulted in additional engineering manpower resources being acquired. Further engineering staff augmentation will continue to fully staff the organizations.

A restructuring of the technical staff and manager training program is being conducted to specifically address the training requirements necessary to support the development of system engineers. This restructured program will be known as the Engineering Support Personnel Training Program. This training program will be implemented by January 1, 1993.