

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914-736-8000



**New York Power
Authority**

November 16, 1992
IP3-NRC-92-088

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

Mr. Richard W. Cooper II, Director
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: **Inspection Report No. 50-286/92-23, Associated
Notice of Violations (92-23-01) and (92-23-09),
and Unresolved Item (92-23-11)**


Dear Mr. Cooper:

Attachment I to this letter provides the Authority's responses to the Notice of Violations (92-23-01) and 92-23-09), and our assessment and planned actions concerning the unresolved item (92-23-11).

In addition, the Authority will compare the weaknesses identified at Indian Point 3 to the programs at James A. FitzPatrick nuclear power station and address any similar weaknesses or inconsistencies identified there.

Should you have any questions please contact Mr. B. Ray at 914-736-8043.

Very truly yours,


William A. Josiger
Resident Manager
Indian Point 3 Nuclear Power Plant

waj/ejd/djc/rj
attachment

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cc: U.S. Nuclear Regulatory Commission (original)
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ATTACHMENT I
RESPONSE TO VIOLATIONS 92-23-01 AND 92-23-09 AND
UNRESOLVED ITEM 92-23-11

VIOLATION: (92-23-01)

During NRC inspection on August 3-6, 1992, the following apparent violations of NRC requirements were identified in accordance with the " General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C:

1. Technical Specification (TS) 6.8.1.e requires that written procedures for Emergency Plan implementation be established and implemented. TS 6.8.3 requires that these Emergency Plan procedures be reviewed by the Plant Operating Review Committee (PORC) and approved by the Resident Manager prior to implementation.

Contrary to the above, from its initial implementation in 1986 and continuing through August 6, 1992, Emergency Plan Volume II procedures that prescribed the means of accomplishing significant emergency response activities did not receive PORC review and Resident Manager approval before implementation. For example, the Emergency Plan Volume II procedure titled " Activation and Staffing of the Emergency Operations Facility (EOF), " Revision 37, dated June 1992, was the procedure used for activating and staffing the EOF for emergency response, directed the performance of functions such as notification of cognizant response personnel about meteorology and about radioactive dose calculations, and neither Revision 37 nor earlier revisions had received PORC review and Resident Manager approval.

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

RESPONSE:

The Authority has reviewed the Notice of Violation outlined in Enclosure 1 of NRC Inspection Report 92-23 and agrees that the violation occurred as described. The reasons for the violation are as follows:

1. In 1986 the Indian Point 3 Emergency Plan was divided into three volumes. Volume II of the Emergency Plan was originally written as a guide or aid for the emergency response organization staff (EROS). It provided a summary and overview of the reviewed and approved procedures that comprise Volume III of the Emergency Plan. It was not originally written as a volume of specific, detailed procedures.

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2. With time the contents of Volume II became more detailed and specific. The emergency preparedness staff did not recognize that Volume II required PORC and Resident Manager approval. Volume II had been reviewed by the Radiological and Environmental Services (RES) Department staff and approved by the RES Manager.

Corrective action included:

1. The review and approval process of the Emergency Plan (Volumes I, II, and III) includes approval by PORC and the Resident Manager for all subsequent revisions.

Full compliance was achieved on November 4, 1992, when Volume II of the Emergency Plan was approved by PORC and the Resident Manager.

VIOLATION: (92-23-02)

During NRC inspection on August 3-6, 1992, the following apparent violations of NRC requirements were identified in accordance with the " General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C:

2. 10 CFR 50.54(q) requires nuclear power plant licensees to follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements in 10 CFR 50 Appendix E. 10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those who may be called in to assist in an emergency. 10 CFR 50, Appendix E, Section IV.F(2).h requires that initial training and periodic retraining be provided to licensee headquarters support personnel. Further, the Indian Point Unit Three Headquarters Emergency Response/Recovery Plan, Revision 8, dated February 2, 1992, Section 8.1, requires that members of the Authority Headquarters organization who have emergency response assignments receive initial training and periodic retraining.

Contrary to the above, as of August 6, 1992, three licensee Headquarters Emergency Response Center (ERC) personnel were listed on the current ERC roster of qualified personnel, Table 5. 1, Headquarters Emergency Plan Implementing Procedures, without having received initial emergency response training. The three emergency response positions involved were: Alternate Operations Manager, Alternate

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Security Manager, and Alternate Administrative/Logistics Manager.

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

RESPONSE:

The Authority has reviewed the Notice of Violation outlined in Enclosure 1 of NRC Inspection Report 92-23 and agrees that the Violation occurred as described, with a clarification: Two of the three individuals had initial training but were not retrained.

The reason for the violation is that the tracking of the Headquarters training and updating of the Headquarters Emergency Plan were shared by two members of the staff without a formal tracking system.

The corrective action to attain full compliance was all three individuals completed training and qualified for Emergency Response Center duties on September 23, 1992.

Corrective action to prevent recurrence is:

A tracking system will be implemented for the Headquarters Emergency Response Center (ERC) similar to that used at Indian Point 3. ERC response personnel training qualifications and Emergency Plan updates will now be the responsibility of one staff member to ensure training requirements are met. The tracking program will be implemented by December 31, 1992.

UNRESOLVED ITEM (92-23-11)

Our inspection did, however, identify weaknesses in the training of Emergency Directors (EDs) and Shift Supervisors (SSs) in making protective action recommendations (PARs). Specifically,, ED qualification did not require practical demonstration of the ability to make PARs, and the EDs and SSs assessed during this inspection were inconsistent in their application of the PAR procedure. The shift supervisors did not clearly understand how to use the PAR flowchart in IP-1017 and had not received training beyond the initial sheltering recommendation at a General Emergency.

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RESPONSE:

The Authority has reviewed the inspection report 92-23 cover letter and agrees that a weakness exists, as described.

The Authority performed an assessment of this issue and determined that the following weaknesses existed:

- 1) The format of procedure IP-1017 "Recommendation of Protective Actions for the Offsite Population" led to inconsistent application.
- 2) The training program did not emphasize the application of the above procedure, and did not require qualification of the practical factors on an individual basis.

The Authority's corrective actions to ensure consistency in making protective action recommendations are as follows:

- 1) Revise the procedure IP-1017 "Recommendation of Protective Actions for the Offsite Population" to clarify the flowchart and Protective Action Recommendation application. This revision will be completed by December 7, 1992.
- 2) Revise the training lesson plans by December 31, 1992 to emphasize consistent application of protective action recommendations.
- 3) Train the emergency directors on the revised procedure IP-1017 by April 30, 1993. This training will emphasize the practical demonstration of their ability to make protective action recommendations, and reemphasize the requirement to continually assess the need to modify the initial protective action recommendation.