

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

William A. Josiger
Resident Manager

December 2, 1992
IP3-NRC-92-087

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: Inspection Report No. 50-286/92-80 and Associated
Notice of Violation (92-80-01)**

Dear Mr. Cowgill:

Attachment I to this letter provides the Authority's response to the Notice of Violation (92-80-01) enclosed with Inspection Report No. 50-286/92-80.

In the Notice of Violation the NRC stated the following:

"Also, we are concerned about other MOV training program weaknesses discussed in section 2.9 of the enclosed report such as the lack of refresher training for diagnostic testing and actuator overhaul work."

Although initial training was completed, the continuing training program was not fully implemented for these tasks. To resolve the concerns, a retraining course for personnel qualified on actuator overhaul tasks is scheduled for the first quarter of 1993. Diagnostic testing retraining for mechanics will be completed prior to next refueling outage.

The Authority concurs with the commitments contained in Table 1 of the inspection report.

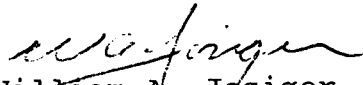
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Should you or your staff have any questions concerning these matters, please contact Mr. J. Vignola at 914-736-8006.

Very truly yours,


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

waj/da/rj

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

IP3 Resident Inspector
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ATTACHMENT I
RESPONSE TO VIOLATION 92-80-01

VIOLATION

10CFR50, Appendix B, Criterion II states in part, that: "The licensee's QA Program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Licensee Procedure No. 3-MD-16, revision 5, "Management Control of Maintenance Training", dated November 18, 1991, section C(2) states that Classroom/Laboratory Training, On-The-Job Training (OJT), and Qualification are the three phases required for qualification in a given duty area.

Additionally, Licensee Electrical Maintenance Qualification Guide No. 701-C on "Valve Testing", revision 2, requires that classroom training be completed prior to OJT.

Contrary to the above, on August 28, 1992, the implementation of the above procedures was inadequate in that the individual performing OJT for differential pressure testing of motor-operated valve AC-MOV-745B did not complete the required classroom training in the signature analysis duty area prior to the OJT assignment.

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 92-80 and agrees with the Violation.

The Authority is presently in compliance with the subject procedures and is implementing changes to avoid further violations.

The reason for the violation was personnel error. The individual involved should not have signed for completion of the signature analysis task. The individual was assisting a qualified engineer. The personnel error occurred due to a procedure deficiency that did not provide clear guidance for documenting completion of a maintenance procedure step.

Interviews with the individuals involved determined that a qualified individual did actually perform the step. The mechanic was signing that the step had been completed and was under direct supervision from the MOVAT engineer.

ATTACHMENT I
RESPONSE TO VIOLATION 92-80-01

Corrective actions that have been taken:

1. The Maintenance Department policy that requires a qualified individual sign procedure steps has been communicated to the staff in training sessions conducted by the Maintenance Department Manager.
2. Maintenance Directives Use of Documented Instructions 3-MD-23 and Management Control of Maintenance Training Qualification and Promotion 3-MD-16 are being revised to clearly state that steps in a procedure must be signed by an individual qualified to perform the step or maintenance department supervisor directly supervising the task. These procedures will be revised by December 7, 1992.