

Indian Point 3
Nuclear Power Plant
P.O. Box 215
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John H. Garrity
Resident Manager

June 16, 1993
IPN-93-063

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

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Stop PI-137
Washington, D.C. 20555

Subject: Reply to Notice of Violation 50-286/93-04

Dear Sir:

The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/93-04. The enclosed Attachment 1 is the Authority's response to the violation.

Very truly yours,

A handwritten signature in cursive script that reads 'JH Garrity'.

John H. Garrity
Resident Manager
Indian Point Unit 3 Nuclear Power Plant

JHG/DOB/vjm

Attachment

cc: see next page

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9306230077 930616
PDR ADOCK 05000286
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cc: Mr. Curtis J. Cowgill, Chief
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ATTACHMENT 1 TO IPN-93-063
REPLY TO NOTICE OF VIOLATION 50-286/93-04

VIOLATION

"During an NRC inspection conducted on February 21, 1993 to April 12, 1993, 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 (1993), the violations are listed below:

10 CFR 50.73(a) requires that licenses shall submit a License Event Report (LER) for any event of the type described in 10 CFR 50.73 within 30 days of the discovery of the event.

Contrary to above, 14 events described in 10 CFR 50.73 occurred between the period July 1, 1992 and February 8, 1993, and the associated LERs were submitted by NYPA later than 30 days following the event discovery dates. Examples include, LERs 92-16, 93-05 and 93-08, which were 42, 41 and 60 days in excess of the thirty-day requirement, respectively.

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

RESPONSE

The Authority agrees with the violation.

The principal reason for the violation was inadequate change management in that management was slow to react to the rapidly increasing volume of Licensee Event Reports (LERs). The number of LERs that Indian Point 3 (IP3) submitted during the last six months of 1992 was more than double that of the previous six months. IP3's commitment to performing quality cause analyses and event investigations for each LER was not matched with a similar commitment to prepare the LERs promptly. Additional resources and new methods were not applied quickly enough to ensure the prompt completion of event investigations needed to produce good LERs.

Since December 1992, IP3 management made a number of unsuccessful attempts to solve this problem. These attempts included changing the responsibilities for writing LERs, acquiring additional resources from line departments, and reorganizing OERG/Licensing into two departments. For various reasons these attempts alone did not solve the problem, and in fact, caused additional delays due to learning curves.

ATTACHMENT 1 TO IPN-93-063
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Finally, a determined management effort resulted in a solution. The Operations Manager assigns each LER to the line department with the primary responsibility for the event being reported in the LER. This department manager has the responsibility for providing a prompt, complete and accurate LER. The Licensing Manager provides oversight and a specific timetable for LER preparation, review, concurrence and approval. IP3 has trained selected line department personnel in cause analysis.

Indian Point 3 has submitted ten LERs since March 26, 1993, and has been in full compliance with the 10 CFR 50.73(a) requirement to submit such LERs within 30 days of the discovery of the respective events.