

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



**New York Power
Authority**

John H. Garrity
Resident Manager

March 4, 1994
IPN-94-026

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Reply to Notice of Violation 50-286/93-029-02

Dear Sir:

The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/93-029. Attachment I is the Authority's reply to the violation. There are no new commitments made by the Authority in this reply.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'John H. Garrity', written over a horizontal line.

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

Attachments

JHG/DWO/vjm

08-145

cc: See next page

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PDR ADDCK 05000286
Q PDR

Handwritten initials or a signature in the bottom right corner of the page, possibly reading 'JHG'.

cc: Thomas T. Martin
Regional Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Richard Cooper, II, Director
Division of Reactor Projects
Region I
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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

See next page for statement of affirmation

State of New York

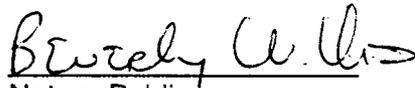
County of Westchester

John H. Garrity, being duly sworn, deposes and says:

I am the Resident Manager of the Indian Point 3 Nuclear Power Plant of which the Power Authority of the State of New York is the owner and operator under Facility Operating License DPR-64. I have read the foregoing "Reply to Notice of Violation 50-286/93-029" and know the contents thereof; and that the statements and matters set forth therein are true and correct to the best of my knowledge, information and belief.


John H. Garrity

Subscribed and sworn to before me
this 4th of March, 1994.


Notary Public

BEVERLEY WILLIAMS
Notary Public, State of New York
No. 24-01WJ 4855981
Qualified in Kings County
Commission Expires April 7, 1994

Attachment I

Reply to Notice of Violation 50-286/93-29-02

Violation

During an NRC inspection conducted on November 14, 1993 to January 7, 1994, 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 (1993), the violation is listed below:

Technical Specifications Section 4.1.B requires sampling and equipment tests to be conducted as specified in Technical Specifications Table 4.1-2 and 4.1-3, respectively. Table 4.1-3, Item 12 requires that a check be made to verify that temporary connections are available and that the valves are operable for the city water connections to the charging pumps and boric acid piping. This check is to be made every 18 months.

Contrary to the above, NYPA's surveillance test procedure (3PT-R-39) used to satisfy the testing requirements of Technical Specification 4.1.B, Table 4.1-3, Item 12, did not test all the valves necessary to ensure operability of the city water connection to the charging pumps. Specifically, valves AC-701A, AC-701B, AC-756A, and AC-756B, had never been tested since surveillance procedure 3PT-R-39 had been originated in 1978.

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

Response To The Violation

The Authority agrees with this violation.

Reason For The Violation

The cause of this event was due to personnel errors resulting from inattention to detail. When surveillance test 3PT-R39 was initially written in August 1978, the procedure writer misinterpreted Technical Specification section 4.1.B by concluding the surveillance requirement applied only to valves and equipment assigned to the City Water system. The Component Cooling Water system valves required to support the emergency city water cooling line-up (AC-701A, AC-701B, AC-756A, and AC-756B) were incorrectly assumed to be outside the testing requirement scope. The error was carried forward in subsequent revisions to the surveillance test.

Corrective Action

The following corrective actions have been performed.

- All subject valves have been manually exercised. This was completed on December 2, 1993.
- The Performance and Reliability Supervisor reviewed LER 93-049-00 and the lessons learned from this event with his staff to reinforce the need for attention to detail. This was completed on December 10, 1993.
- Surveillance test 3PT-R39 was revised to include exercising all valves required to establish city water flow to the charging pump oil coolers. This was completed on January 14, 1994.

Corrective Actions That Will Be Taken To Prevent Recurrence

The following corrective action will be taken to prevent recurrence of this event.

The Indian Point 3 Inservice Testing Program (IST) has recently been revised to revision 4, dated November 5, 1993. Included in this new revision are the quarterly exercising of AC-701A and AC-701B and the cold shutdown exercising of AC-756A and AC-756B. Implementing procedures for these new IST testing requirements will be developed by April 1, 1994. This corrective action was a previous commitment in LER 93-049-00 and was identified as IPN-93-155-02.

The Date When Full Compliance Will Be Achieved

The Authority was in full compliance on December 2, 1993.