

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.3001



John H. Garrity
Resident Manager

September 22, 1993
IPN-93-110

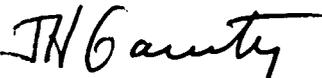
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop PI-137
Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Reply to Notice of Violation 50-286/93-13-03

Dear Sir:

The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/93-13. The enclosed Attachment 1 is the Authority's response to the violation. The open commitments made in Licensee Event Report 93-012-00, which served to report the event, are restated in Attachment 2.

Very truly yours,


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

JHG/FRP/vjm

Attachment

cc: see next page

9309280029

7pp.

cc: Mr. Curtis J. Cowgill, Chief
Project Branch No. 1
Division of Reactor Projects
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3

ATTACHMENT 1 TO IPN-93-110
REPLY TO NOTICE OF VIOLATION 50-286/93-13-03

VIOLATION

During an NRC inspection conducted on June 1, 1993 to July 19, 1993, 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 Specification 3.3.D.1.a requires all portions of the four Weld Channel and Containment Penetration Pressurization System (WCCPPS) zones to be pressurized above 43 psig whenever the plant is above the cold shutdown condition.

Contrary to the above, containment penetration R-R was not pressurized by WCCPPS from December 1990 to April 7, 1993. Indian Point 3 operated above the cold shutdown condition during a majority of this period.

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

RESPONSE

The Authority agrees with the violation.

REASONS FOR THE VIOLATION

The disconnect of the WCCPP supply line most probably occurred during Integrated Leakage Rate Test (ILRT) preparation work for the ILRT conducted during the 7/8 refueling outage. The ILRT was completed on December 2, 1990 and the 7/8 refueling outage ended on December 23, 1990.

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The cause of the event was personnel error (error in judgement) in that the Performance supervisor directed ILRT preparatory work activities which were performed in violation of established procedures. The WCCPP disconnect was performed outside of the control of the ILRT test (3PT-3Y1) and the work control process. Procedures directing the isolation, changes to piping configuration and restoration of systems were not used. Procedures were in effect that direct changes to system configuration. Administrative Procedures AP-9, "Work Control", AP-10, "Clearances", AP-10.1, "Operating Orders and Control of Stop Tags, Do Not Operate Tags and Locks", and AP-13, "Temporary Modification Procedure" provide that direction.

CORRECTIVE ACTIONS

Performance and Operations personnel were apprised of the requirements that need to be met before changing system configurations.

Surveillance test 3PT-3Y1 will be reviewed to ensure that all changes made to plant configuration for the performance of the test are documented within the test and returned to normal at test completion. Direction for retesting of restored penetrations will be required by the surveillance test. The test will be revised by October 31, 1993.

Surveillance test 3PT-3Y1 will be revised by October 31, 1993 in order to include the ILRT test line leakage integrity check required in preparation for an ILRT. Upon revision the test will be "walked-down" in order to review the completeness and accuracy of the test. This "walk-down" will entail a review for accuracy by analyzing if all ILRT test evolutions are provided in sufficient detail in the test and to determine if evolutions are performed in logical sequence.

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A review of the penetrations in the pipe penetration area has been performed to verify the status of WCCPP local isolation valves. The results of that review determined that the system status downstream of the weld channel racks was as required.

Operations revised the WCCPP Check Off List COL-CB-2, "WCCPP System" to include the manual isolation valves for penetrations "RR", "XX" & "YY". The revised Check Off List became effective on May 6, 1993.

A field walkdown of piping and electrical penetrations both inside and outside of containment was performed on April 27, 1993 in order to determine extent of condition (e.g., identify other possible disconnections). This walkdown revealed that WCCPP isolation valves GLV-17, GLV-18, and GLV-19 associated with penetrations "RR", "XX", and "YY" respectively were not tagged. These valves have been tagged and included in the COL as indicated above.

CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

Procedures were in effect that provide direction on changes to system configuration. These procedures provide adequate direction and do not require revision in order to avoid further violations of this kind.

The review of surveillance test 3PT-3Y1 will ensure that all changes made to plant configuration for the performance of the test are documented within the test and returned to normal at test completion.

The revision of surveillance test 3PT-3Y1 will serve to include the ILRT test line leakage integrity check required in preparation for an ILRT. The revision will require the test to be "walked-down" in order to review the completeness and accuracy of the test. This "walk-down" will assure that all ILRT test evolutions are provided in sufficient detail in the test and to determine if evolutions are performed in logical sequence.

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In addition to the corrective actions specified above, the review and revision of surveillance test 3PT-3Y1 will provide reasonable assurance that further violations involving the ILRT preparatory work activities will not occur in the future.

DATE FULL COMPLIANCE WAS ACHIEVED

Maintenance reconnected the WCCPP supply line at approximately 2141 hours on April 7, 1993. This action restored the required configuration. Operations Test Group successfully completed the "As-Found" leak rate test of the penetration "RR" ILRT test lines on April 23, 1993.

ATTACHMENT 2 TO IPN-93-110
REPLY TO NOTICE OF VIOLATION 50-286/93-13-03

Number	Commitment	Due
IPN-93-033-02	Surveillance test 3PT-3Y1 will be reviewed to ensure that all changes made to plant configuration for the performance of the test are documented within the test and returned to normal at test completion. Direction for retesting of restored penetrations will be required by the surveillance test. This commitment was made in LER 93-012-00.	October 31, 1993
IPN-93-033-03	Surveillance test 3PT-3Y1 will be revised by October 31, 1993 in order to include the ILRT test line leakage integrity check required in preparation for an ILRT. Upon revision the test will be "walked-down" in order to review the completeness and accuracy of the test. This "walk-down" will entail a review for accuracy by analyzing if all ILRT test evolutions are provided in sufficient detail in the test and to determine if evolutions are performed in logical sequence. This commitment was made in LER 93-012-00.	October 31, 1993

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**New York Power
Authority**

John H. Garrity
Resident Manager

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Very truly yours,

A handwritten signature in cursive script that reads "JHG Garrity".

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

JHG/FRP/vjm

Attachment

cc: see next page

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9309280029 930922
PDR ADDOCK 05000286
G PDR

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

cc: Mr. Curtis J. Cowgill, Chief
Project Branch No. 1
Division of Reactor Projects
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
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