

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



John H. Garrity  
Resident Manager

December 22, 1993  
IPN-93-165

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

Subject: Indian Point 3 Nuclear Power Plant, Docket No. 50-286  
Improved Work Control Processes At Indian Point 3 Nuclear Power Plant

Dear Sir:

The New York Power Authority submits this letter in response to the NRC Staff request at a meeting on December 10, 1993. At this meeting we discussed examples of procedure violations reported in NRC Region I Inspection Report 50-286/93-22 dated November 26, 1993. We also discussed three additional events which were solely, or in part, the result of procedure violations. Some of these events resulted in inadequate configuration control of the plant. For the most part these events were identified by Authority personnel and had little or no safety significance. However, the Authority is very aware of the broader implications of these events to the operation of Indian Point 3.

The Authority has responded to these events and has adopted improvements to the plant work control process. Some of the immediate corrective actions we took to ensure that control of the plant's configuration is maintained at all times were discussed at the December 10 meeting. During that discussion the NRC staff requested this letter documenting the specific actions we took to upgrade the work control process.

The Authority reduced the amount of work being performed, slowed down the work control process, and tightened the controls on work clearances and operating orders. The following actions were taken:

- The Operations Department stopped all work following the December 3 fan cooler unit event and evaluated all outstanding work clearances to ensure that adequate personnel and equipment protection were provided before allowing work to resume;
- Risk assessments were verified for the work scheduled for the week following the work stoppage;
- Shift supervisors now review the work schedule to ensure that they can effectively support all activities and that operational conflicts do not exist;
- In order to slow the work flow, work is now being conducted from a three day rolling schedule. Only work that is ready to be performed is permitted on the three day schedule. Changes to the three day schedule for existing or high priority work and changes to the seven day schedule for new or low priority work now require the

9312300178 931222  
PDR ADDCK 05000286  
G PDR

*Foot  
1/10*

- approval of the Outage Manager and shift supervisor;
- The Operations Department now restricts the use of Area Work Clearances to only non-intrusive work; (The Operations Department specifies the required protection for intrusive work.);
- The Operations Department now requires a second verification for specification and application of worker and equipment protection; New work packages now include a step where the workers verify the protection of personnel and equipment prior to starting work activities;
- Work clearances are linked to specific work requests through the work request number; This provides additional assurance that workers are aware of the bounds of the clearance;
- The Operations Department instituted a clearance and work request report to assure communication between the shift supervisor and the individuals performing the work; Individuals requesting work clearances are required to sign on and off with the shift supervisor or assistant shift supervisor for each work package on each day;
- To enhance communication between the shift supervisor and the individual requesting the work clearance, the Operations Department has limited the number of personnel obtaining clearances from entering the office at one time;
- Shift supervisors have delegated many of their administrative duties to the on-shift assistant shift supervisor enabling the shift supervisors to better monitor work activities;
- The Maintenance Department is in the process of evaluating their first line supervisors and, based on these evaluations, retraining of some supervisors will be conducted prior to resuming supervisory duties;
- Procedure adherence was reemphasized by subjecting all personnel to random testing on procedure adherence and retraining if they fail the test.

In response to the additional events and to improve the work control process at IP3, the Authority established an interdepartmental working group of managers and supervisors from IP3 and James A. FitzPatrick (JAF). The group reviewed the work control and central planning and scheduling programs to provide corrective actions to assure appropriate work control. The work control procedures are being revised to incorporate the group's corrective actions and training on the procedure revisions will be performed. As an interim measure, personnel performing work activities have been briefed on their responsibilities for the new work control practices through the shift supervisors, department managers and supervisors, as appropriate. In addition, the Resident Manager conducted an all hands meeting to emphasize that the Operations Department has the responsibility to ensure plant configuration control and to reemphasize everyone's responsibility to support this effort.

In addition to the corrective actions noted above, the following actions, which were detailed in our handout provided in the December 10 meeting, are summarized below:

- Counselling, procedural upgrades, training, stop work orders, review of recent events by an outside consultant, implementation of checklists to identify procedural errors, and disciplinary action taken;
- Performance standards were tightened in the areas of procedure adherence, self-

- verification, and planning techniques;
- Communication of management expectations was improved by establishing new forums for frequent exchange of information, additional training on lessons learned, and team building by matching the shifts of the Operations Department and the Maintenance Department crews with those of the supervisors;
- Assessment processes were enhanced by "management by walking around," Total Quality Management processes, checklists for verification of procedure adherence, performance reviews of crews, and an organizational and programmatic review of the Operations Department by a consultant.

I believe the above actions provide the basis for continuing work. Their effectiveness in maintaining plant configuration and control has been demonstrated. Now that the work flow has been slowed and effectively controlled we are using the slower pace to improve our staff's work practices. We plan to continue at this pace until our staff fully adopts the new techniques and work practices.

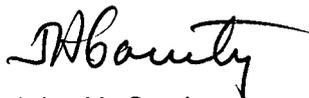
We plan to continue monitoring our corrective actions to ensure their effectiveness and modify them as necessary. Our assessments of the effectiveness of our corrective actions will also include frequent and periodic inspections by the Appraisal and Compliance Department.

The rate and type of work to be allowed is controlled by the shift supervisors. Only when the shift supervisors are satisfied with well planned packages, appropriate scheduling, trained personnel who are knowledgeable of their job, and proper task completion, will the work rate be increased, and then only in a controlled manner.

No new commitments are being made with this submittal.

If you have any questions please contact me.

Very truly yours,



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

JHG/JC/DJC

cc: see next page

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

Mr. Curtis J. Cowgill III, Chief  
Project Branch I  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Mr. Nicola F. Conicella, Project Manager  
Project Directorate I-1  
Division of Reactor Projects I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop 14B2  
Washington, DC 20555

U.S. Nuclear Regulatory Commission  
Resident Inspectors Office  
Indian Point 3