POWER AUTHORITY OF THE STATE OF NEW YORK

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July 14, 1982
IPN-82-54

Ronald C. Haynes, Regional Administrator
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
SALP Report

Dear Sir:

This letter provides the Authority's comments regarding the Commission's May 28, 1982 Systematic Assessment of Licensee Performance (SALP) Report.

Attachment 1 contains comments for each functional area contained in the report which the Authority wishes to address.

If you have any questions please contact Mr. J. Lamberski of my staff.

Very truly yours,

J.P. Bayne
Senior Vice President
Nuclear Generation

cc: Resident Inspectors Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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ATTACHMENT I

Authority Comments

on the

May 28, 1982 SALP Report

Power Authority of the State of New York
Indian Point 3 Nuclear Power Plant

July, 1982

Functional Area No. 1 - Plant Operations

The NRC May 28, 1982 SALP Report stated, in part, that:

> New NRC guidelines have been issued to acquire three licensed operators on each shift. The licensee's staffing in the operations area is currently not sufficient to meet this requirement. The licensee has presently requested relief from NRR in this area. Vacation, sickness, unexplained absences, and training are provided for by licensed operators working overtime. The licensee has not displayed any evidence of increasing the staff in the operations department. Currently there are no individuals in license training. However, three employees are awaiting the results of a recent examination.

Comment:

On February 8, 1982, the Authority documented its plans for operator training and increasing staff to meet the minimum shift crew requirements (NUREG-0737, item I.A.1.3.2). This response was repeated with a minor schedular change in our June 4, 1982 letter (IPN-82-44) regarding Post TMI Requirements, as follows:

> As stated in our February 8, 1982 letter (IPN-82-15), the Authority has reviewed its licensed operator training program and has determined that sufficient ROs will not be licensed by July 1, 1982 to provide the additional RO. Four (4) additional ROs have recently been qualified and are awaiting their licenses and one (1) is awaiting final processing of his exam. Three (3) of these individuals, however, will be used to replace existing ROs who will be removed from shift work to be trained for Senior Reactor Operator (SRO) licenses.
>
> At this time, the Authority plans to provide the additional RO by November 1, 1983 contingent upon sufficient personnel being licensed during the next training cycle scheduled to begin following the cycle 3/4 refueling outage. During the interim period, the Authority will maintain the additional RO being provided by Consolidated Edison on an as needed reciprocal basis during Emergency Plan Conditions. The Power Authority normally maintains a five (5) section rotation for licensed operators. As additional operators are licensed in excess of these requirements they will be placed on a normal shift rotation in the control room.

Functional Area No. 6 - Emergency Preparedness

The March 28, 1982 Report referred to a March 2, 1982 Indian Point full scale emergency exercise.

Comment:

The Indian Point emergency exercise took place on March 3, 1982.

Functional Area No. 9 - Licensing Activities

The March 28, 1982 Report indicated that in some areas "the licensee submitted viable approaches which appeared to be lacking thoroughness or depth. In these cases in particular, it appears the licensee is attacking the symptom instead of the root cause of the problem". The report further stated that "there are several areas in which resolution of technical issues is being delayed due to a lack of a response from the licensee, and this area needs improvement."

Comments:

As mentioned during the June 10, 1982 meeting regarding the SALP Report, the Authority would like the Commission to identify those areas on which the above quoted statements are based. The Authority will then concentrate on improving those areas which are attributable to an unjustified lack of sufficient effort.

Comment:

The Indian Point emergency exercise took place on March 3, 1982.

Functional Area No. 9 - Licensing Activities

The March 28, 1982 Report indicated that in some areas "the licensee submitted viable approaches which appeared to be lacking thoroughness or depth. In these cases in particular, it appears the licensee is attacking the symptom instead of the root cause of the problem". The report further stated that "there are several areas in which resolution of technical issues is being delayed due to a lack of a response from the licensee, and this area needs improvement."

Comments:

As mentioned during the June 10, 1982 meeting regarding the SALP Report, the Authority would like the Commission to identify those areas on which the above quoted statements are based. The Authority will then concentrate on improving those areas which are attributable to an unjustified lack of sufficient effort.

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ENCLOSURE 3