

Indian Point 3
Nuclear Power Plant
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**New York Power
Authority**

Joseph E. Russell
Resident Manager

September 23, 1991
IP3-91-054

Docket No. 50-286

Mr. Thomas T. Martin, Regional Administrator
Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Re: Initial SALP Report No. 50-286/89-99

A review of Initial SALP Report No. 50-286/89-99 dated
August 26, 1991 is complete.

The Authority appreciates the affirmation of good
performance in the majority of the functional areas and
will continue to re-enforce these strengths. The
identified weaknesses are being resolved by the actions
described in Attachment I.

The Authority identified, in Attachment I, items in the
emergency preparedness area that should be considered
for revision to the SALP report.

Should you or your staff have any questions regarding
this matter, contact M. Peckham at 914-736-8041.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'J. E. Russell', written over a circular stamp.

Joseph E. Russell
Resident Manager
Indian Point 3 Nuclear Power Plant

BJR:RJ
Attachment

TEH

cc:

U.S. Nuclear Regulatory Commission (original)
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, Georgia 30339

IP3 Resident Inspector
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, New York 10511

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SALP NO. 50-286/89-99 RESPONSE
ATTACHMENT I

Operations

Program improvements have begun in work control and refueling activities to preclude recurrence of the operational events experienced during this SALP period. A separate group has been created to provide administration of the plant's work control activities. Improvements in the operator training program were reflected by the success of the July, 1991 requalification examination.

The stuck fuel incident investigation, performed by the Authority, identified weaknesses in the refueling procedures and control of refueling activities. The Authority will establish, prior to entering each refueling outage, an IP3 refueling organization with a designated manager to provide direct control over all refueling activities. The Authority will rewrite the refueling procedures to improve controls on refueling evolutions. Training will be conducted on the revised refueling procedures.

The SALP report states, "Some of the procedures written for the recovery of the stuck fuel assemblies lacked detailed levels of information for critical activities and consideration of contingencies." The procedures that were actually used to recover the stuck fuel assemblies were corrected to contain appropriate levels of detail for critical activities and contingencies.

The Resident Manager and General Manager of Operations are dedicated to ensuring that each individual operator performs in a professional manner. Assessments have been performed in Operations and weaknesses were addressed.

Radiological Controls

The Authority appreciates the positive comments that reflect our commitment to excellence of radiological controls at Indian Point 3.

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The SALP report addresses the staffing level assessment conducted by the Authority. Implementation of the staffing consultant's recommendations are in progress. Presently, the radwaste staff is supplemented with contractors while planning for permanent positions continues.

Maintenance

The SALP report addresses weaknesses in the station's preventative maintenance program and resolution of maintenance technical issues. Efforts to improve these programs have been successful. New administrative controls ensure preventive maintenance is more timely by having deferrals approved by higher levels of management. A Materials Manager position has been created and an appointment made to ensure the availability of parts to support the preventive maintenance program. Procurement of a new hydrogen recombiner system has been initiated. These actions reflect the Authority's ability and determination to resolve technical issues.

The report identifies examples of weaknesses in the performance of maintenance tasks and the conduct of quality assurance holdpoints. Considering that greater than four thousand tasks were accomplished during the reporting period, the Authority does not distinguish the weaknesses as programmatic. Counseling of personnel and a procedure revision have been accomplished.

Surveillance

The implementation of temporary procedure changes has been upgraded through more explicit guidance and retraining of personnel.

Changes to the surveillance test review process have resulted in additional and more thorough evaluations of fire protection and safety-related systems tests.

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Emergency Preparedness

Corrections of the following paragraphs are requested:

Page 13, paragraph 1 "Managers...participated in one station drill and one exercise each year...It has been the practice to conduct one drill in addition to the NRC evaluated exercise each year..." The Authority's review of the number of exercises during the SALP period identifies four practice/training, two NRC partial exercises, two post-accident sampling, and three medical emergency drills. In addition, each operating crew performs an annual accident scenario at the IP3 simulator designed to assess emergency plan implementation activities.

Page 13, paragraph 2 "...the response to the full-participation exercise..." The Authority's review of exercises conducted during the SALP period did not identify any full-participation exercises.

Page 13, paragraph 3 "Off-site emergency preparedness was largely the responsibility of the Consolidated Edison Company..." The Indian Point 3 Emergency Plan identifies joint and cooperative efforts for various offsite responsibilities.

The following comments are presented in an effort to resolve concerns:

The SALP report states, "...the partial exercise later in the period was based upon a scenario which did not seriously challenge all components of the response organization."

Scenarios for partial exercises are designed to achieve the approved objectives of the exercise and are based upon NRC IE Notice 87-54, "Emergency Response Exercises". The 1991 scenario challenged Operations Support Center personnel with fourteen dispatched corrective action teams. Technical Support personnel performed core damage assessment, potential for NII Ductility Transition effects, interfacing system LOCA potentials, reactor coolant system steam void formation potential effects, and other calculations.

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The NRC states in the SALP report, "the qualified ERO staff number fell below that specified in the ERP roster, due to a lapse in training for some individuals." The Authority checked on the qualified ERO staff members during the SALP period and identified that nearly twice the amount required for the minimum staffing requirements were qualified.

Security and Safeguards

During this SALP period, management aggressively implemented significant upgrades of security systems and equipment. As part of the upgrades, a review and revision of the security plan is being performed and will be resubmitted to the NRC. Specific weaknesses identified during this period have been corrected, and management attention toward improving the security program is continuing.

A security training and qualification scheduling and tracking system was implemented with additional administrative controls to ensure personnel requalifications are performed on time. Performance of on-shift training will enhance effectiveness and improve practical factors through feedback. The additional training staff position, temporarily supported by a contractor, is expected to be filled by next year.

The Authority assessed the effectiveness of the Quality Assurance security audit program and determined that the performed audit, combined with the thirty-seven performance based surveillances, addressed all areas except training. The format of the audit report did not reflect the detail of the checklist for all areas inspected, but it will reflect the full scope in the future. The Authority will augment the technical expertise of the security audit team. The audit will include performance based surveillances that cover training.

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Engineering & Technical Support

Formalization of engineering activities, including the use of checklist, continues to be implemented to ensure attention to detail during the conduct of engineering activities. The creation of a "system engineer" approach for identifying and resolving technical issues is proving successful.

All requests for engineering services (RES) have been reviewed and prioritized in a five year plan. Approximately fifty percent of the backlog was material substitution evaluations and is attributed to difficulty in attaining replacement parts. Contractor personnel are being employed to supplement the staff in reducing the backlog.

The corporate engineering division is establishing a satellite group at the site to improve the effectiveness of the Indian Point 3 modification process.

Safety Assessment/Quality Verification

The SALP report addresses a concern for prompt correction of deficiencies. The Authority has strengthened the process for following up on deficiencies.

The appointment of three general managers, increased frequency of status reports, and escalation of delinquent items to upper management are improving the process.