POWER AUTHORITY OF THE STATE OF NEW YORK INDIAN POINT NO. 3 NUCLEAR POWER PLANT

P. O. BOX 215 BUCHANAN, N. Y. 10511

TELEPHONE: 914-739-8200



February 5, 1979 IP-JWK-3947

Docket No. 50-286 License No. DPR-64

Eldon J. Brunner, Chief Reactor Operations & Nuclear Support Branch United States Nuclear Regulatory Commission Region 1, 631 Park Avenue King of Prussia, Pennsylvania 19406

Subject: Inspection 50-286/78-33

Isolation Valve Testing

Violation

Dear Mr. Brunner:

Inspection Report 50/286-78-33 identified an infraction as follows:

"Technical Specification 4.4.E.1.B through d states in part, that: "Isolation valves in Table 4.4-1 which are pressurized by the Weld Channel and Penetration Pressurization System.... which are pressurized by the Isolation Valve Seal Water Systemwhich are not pressurized will be tested at intervals no greater than 2 years."

"Contrary to the above, the subject valves were not tested from January 1975 until the period June to August, 1978, an interval greater than 2 years."

The initial start dates of the surveillance period were taken to be the issuance date of the Operating License, April 5, 1976 and not the date the test was performed during the pre-operationsl test program. This commencement period was acknowledged by the NRC Region 1 inspector during the pre-operational test program.

CCP

Regarding the testing of isolation valves, the original issue of the Technical Specifications specified that they be tested at refueling intervals, with a maximum time not to exceed 18 months. This maximum interval of 18 months also applied to the other tests required to be performed at refueling outages.

On September 26, 1977, Amendment 7 was issued to the Technical Specifications allowing the 18 month maximum interval to be extended for the first refueling cycle. This amendment also changed the maximum interval of 18 months for valve testing previously required in the Technical Specifications to every two years to be consistent with 10 CFR 50 Appendix J.

7904040014

Eldon J. Brunner

Page Two

February 5, 1979 IP-JWK-3947

As stated in the Amendment safety evaluation, the purpose of the test interval was to test the specified components at scheduled refueling shutdowns and did not require earlier testing of the containment isolation valves.

The tests on the containment isolation valves were performed during the first refueling outage. We believe this to be consistent with the requirements of the Technical Specifications and Appendix J. of 10 CFR 50.

Very truly yours,

Resident Manager

JWK/rbb