

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

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November 13, 1979
IP-SLM-6169

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

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

Subject: Inspection 50-286/79-19
Operations Inspection
Violation

Dear Mr. Brunner:

Inspection Report 50-286/79-19 identified one infraction and three deficiencies as follows:

- A. Technical Specification 6.8.1 states in part that, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972 ..."

Regulatory Guide 1.33, Appendix "A", Paragraph E, specifies the preparation of "Procedures for Correcting Abnormal, Offnormal, or Alarm Conditions."

Contrary to the above, it was observed that there were no written alarm procedures established for twenty-three alarm annunciators located on various alarm panels in the Control Room.

Response

- A. Alarm Response Procedures are being extensively reviewed and revised. These procedures will incorporate the addition of all new alarms and will be reviewed and approved prior to the unit returning to service from the present outage. In the future new alarms will be more expeditiously included into these procedures.
- B. Technical Specification 6.8.3 states, in part, "Each procedure of 6.8.1 above ... shall be reviewed by the PORC ... prior to implementation."

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AP-3, "Procedure, Preparation, Review, and Approval", paragraph B, states in part, "Procedures applicable to Category I equipment or which pertain to the Environmental Technical Specification requirements shall be reviewed by the Plant Operating Review Committee and approved by the Resident Manager ..."

Contrary to the above, it was observed that four system operating procedures, three emergency procedures, and forty-nine system check-off lists were not approved by the Plant Operations Review Committee under the present licensee or by the Plant Operations Review Committee of the previous licensee.

Response

- B. The four system operating procedures, three emergency procedures and the forty-nine check off lists identified as not having Plant Operations Review Committee review were reviewed and approved by the previous licensee in accordance with existing rules and regulatory requirements. At the time of approval, check off lists were not determined to be a procedure, but rather an aid to the operator in performing an approved procedure. At a Power Authority Plant Operations Review Committee meeting on March 24, 1977, which is in the meeting minutes, the present licensee discussed and approved the acceptance of the previous licensee's check off lists and procedures upon receipt of the operating license. The procedures and check off lists would then be reviewed and revised as necessary on a bi-ennial frequency.

All procedures having safety related significance or affecting Environmental Technical Specifications, including check off lists, are now reviewed by the Plant Operations Review Committee. By March 18, 1980 all operations procedures, including check off lists, will be reviewed by the Plant Operations Review Committee.

Therefore it is felt that this item is not contrary to Technical Specifications 6.8.3 nor AP's 3 and 21 and does not constitute a deficiency level item of noncompliance.

- C. Technical Specification 6.8.2 states in part, "Temporary changes to procedures above may be made provided: ... b. The change is approved by two members of the plant staff ... c. The change is documented, reviewed by PORC and approved by the Resident Manager ..."

AP-3, "Procedure, Preparation, Review and Approval", paragraph 3.B and E states, in part,

"B. A Temporary Procedure Change Notice (TPCN) ... shall be completed prior to initiating a temporary change to a procedure ...

E. Completion of the Temporary Procedure Change Notice and required signatures shall document the required temporary change review and approval."

Contrary to the above, it was observed that four procedures had pen and ink changes posted to them for which there were no Temporary Procedure Change Notices in effect. In addition, there were Temporary Change Notices posted to two procedures which were noted in the temporary change log as having been previously cancelled.

Response

- C. The pen and ink changes in the Control Room copies of procedures SOP-EL-1, SOP-RC-1, ARP-SEF and ARP-SHF have been removed. These changes were actually annotations which did not obliterate any part of the original procedure and did not have any safety related significance. In some cases the changes were more conservative than the original procedure. These procedures are being reviewed and, if valid, these changes will be officially incorporated into a procedure revision prior to the unit returning to service from the present outage.

The operators have been instructed not to make any unofficial changes into the official procedures books. In addition, by November 15, 1979, a notice is being placed in the front of all the official procedure books in the control room, Shift Supervisor's office and both Nuclear Plant Operator offices to remind personnel to follow AP-3 when desiring changes to procedures.

TPCN 76-28, which is posted to PEP-RCS-1, and TPCN 78-34, which is posted to SOP-RPC-4, are still in affect as annotated in the TPCN log. In both cases the confusion is the result of initially assigning the TPCN numbers to other procedure changes which were never used. These changes were cancelled prior to their use and deleted in the log. The TPCN numbers were made available again.

- D. Technical Specification 6.8.3, states in part, "Each procedure of 6.8.1 above ... shall be reviewed by the Plant Operations Review Committee ... and reviewed periodically as set forth in administrative procedures."

AP-3, Procedure, Preparation, Review and Approval", Paragraph B, states in part, "Procedures affecting nuclear safety shall be reviewed at an interval of every two years to determine if changes are necessary or desirable ... Any deficiencies noted with respect to the content of approved procedures should be promptly brought to the attention of appropriate management personnel."

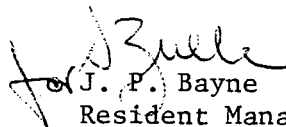
Contrary to the above, it appears that the intent of the procedure review program is not being implemented in that comments to 70 procedures made over a 2 year (1977-1979) period as a result of the procedure review program have not been incorporated into the procedures or otherwise resolved.

Response

- D. As listed in the findings some of the procedures were listed twice or incorrectly. As a result operator procedure review comments were generated for 53 procedures. Most of the comments are minor changes and do not change the intent or the basic steps for performing a desired operation. However an intensive effort is being performed to review and revise our operating procedures which will also include all applicable comments from the operator procedure reviews. This is scheduled to be completed by March 18, 1980. In the future, comments will be reviewed and incorporated into procedure revisions, as applicable, in a more timely manner.

It is our opinion that the actions described above are adequate to correct and to avoid recurrence of these items.

Very truly yours,


for J. P. Bayne
Resident Manager

SLM/bam