

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

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TELEPHONE: 914-739-8200



December 19, 1980

Boyce H. Grier, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Ave.  
King of Prussia, PENN 19406

Dear Mr. Grier:

This letter is provided in response to your letter of November 25, 1980, received at my office on December 1, 1980, concerning Inspection 50-286/80-11 conducted by Mr. T. J. Jackson.

The responses to the items of non-compliance identified in the subject Inspection Report are presented in Attachment 1. These responses detail the specific actions being taken to correct the items of non-compliance and to prevent similar occurrences in the future.

As you are aware, Consolidated Edison, acting as an agent for the Power Authority of the State of New York, conducts environmental monitoring for the Indian Point site. The Power Authority will ensure that the actions committed to in Attachment 1 are carried out. In addition, these items will be included in future audits of the environmental monitoring program.

Very truly yours,

Handwritten signature of S. S. Zulla.

S. S. Zulla  
Resident Manager

DMQ:dp

cc: Director of Nuclear Regulation (2 copies)  
Office of Management Information and Program Control  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

T. Rebelowski, Resident Inspector

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Item A

Section 4.2.1.1. of the Environmental Technical Specification Requirements (ETSR) requires that environmental samples be collected and analyzed according to Table 4.2-1. Table 4.2-1 requires, in part, that drinking water samples and surface lake water samples be analyzed for Sr-90 once per year.

Contrary to these requirements, Sr-90 analyses were not performed on drinking water samples or surface lake water samples collected during 1979.

Item A Response

The analysis of drinking water and surface lake water samples for Sr-90, as required by Table 4.2-1 of the ETSR, was omitted in 1979 through an oversight in Program management. As noted by your inspector, this requirement was fulfilled in both 1978 and 1980. In order to prevent a recurrence of this item, a Computer Program is being finalized which will "flag" both required and overdue analyses. It is anticipated that this computer program will be operational for the 1981 Nuclear Environmental Monitoring (NEM) Program year. In addition, Program management has been reminded of the necessity of adhering to both the sampling and analytical requirements of Table 4.2-1.

Item B

Section 4.2.1.1 of the ETSR requires that environmental samples shall be collected and analyzed according to Table 4.2-1. Table 4.2-1 requires in part that drinking water samples be collected and analyzed monthly from Station No. 56, the New York City aqueduct.

Contrary to these requirements, drinking water samples from the New York City aqueduct were not collected and analyzed from January 2 until May 21, 1979.

Item B response

The delay in implementing the changes in the ETSR relative to collecting and analyzing drinking water samples from Station No. 56, the New York City aqueduct, was due to a delay in internal communications within the Consolidated Edison system. Notification of this Technical Specification change was not received by NEM Program management for several months after it was issued, and hence the delay in implementation. In order to prevent a recurrence of this item, we have ensured that discussions were held with personnel responsible for disseminating such information and assurance has been given that information will be transmitted to affected parties immediately upon receipt.

Item C

Section 3.1.4.1 of the ETSR requires that delta Tc described in Section 3.1.1 shall be differentiated to provide the rate of change of temperature, and that this information shall be recorded during all flow conditions.

Contrary to these requirements, rate of change of temperature was not recorded during the periods April 29 to May 19, May 20 to 24, May 26 to 30, June 4 to 9, and June 10 to July 7, 1980.

Item C Response

This item was the result of recurrent pluggage within the pen and associated capillary tubing of the subject recorder. The recorder has been repaired.

In order to prevent further items of non-compliance, an investigation of recorder modifications which would include either an improved inking system or a printing system which does not employ ink is being made. Until these modifications are complete, the existing recorder has been placed on a weekly preventive maintenance program.

Item D

Section 5.6.1.a of the ETSR requires in part that Part B of the Annual Environmental Operating Report include the results of land use censuses required by the Technical Specifications. Section 4.2.1.3 of the ETSR requires in part that a census of milk animals be conducted at the beginning of each grazing season.

Contrary to these requirements, results of milk animal censuses were not reported in the Annual Environmental Operating Reports for 1977, 1978, or 1979.

Item D Response

The milk animal censuses were in fact performed for 1977, 1978 and 1979, but the results were not reported in the Annual Environmental Operating Reports. The milk animal census will be included in all future Annual Environmental Operating Reports. This will be verified in the Plant Operating Review Committee review of the Reports and in Quality Assurance Audits of the environmental monitoring program.

Item E

Section 5.5.3 of the ETSR requires, in part, that if temporary changes are to be made to procedures, the changes must be approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's license, and that the change be documented, reviewed by PORC and approved by the Resident Manager within 30 days of implementation.

Contrary to this requirement, temporary procedure changes including Texas Instruments designated procedure change Nos. 80-09, 80-10, 80-11, 80-12 and 80-13, which were made and implemented in Spring of 1980 relative to various aspects of the biological/ecological sampling program, (a) were not approved by PASNY staff prior to implementation and (b) were not reviewed by PORC, nor approved by the Resident Manager.

#### Item E Response

All changes to non-radiological environmental monitoring procedures are now reviewed by a Power Authority aquatic biologist. This review is performed to ensure that the change does not reduce the ability of the Indian Point General Ecological Study to secure data needed to evaluate the effects of operation of the once-through cooling system of the Indian Point Units 1, 2 and 3 on the Hudson River Ecosystem, or to devise means and methods of minimizing adverse effects.

Following review by the Aquatic Biologist, the procedure is forwarded to the Plant Operating Review Committee (PORC) with his recommendation for PORC approval. PORC then reviews the change to ensure that no unreviewed safety questions are involved.

In addition to the mechanism described above for review of procedure changes, temporary procedure changes will be reviewed and approved, prior to implementation, by two members of the plant staff, one of whom holds a Senior Reactor Operator's License.