

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 13, 1981

IP-RAS-12040

Reactor Operations and Nuclear Support Branch  
U. S. Nuclear Regulatory Commission  
Region I  
63] Park Avenue  
King of Prussia, Pennsylvania 19406

ATT: Mr. Eldon J. Brunner  
Chief of Reactor Operations and Nuclear Support Branch

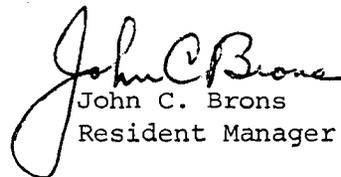
SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Inspection 50-286/80-20

Dear Sir:

This letter responds to your Inspection Report No. 50-286/80-20 dated January 20, 1981.

Attachment I includes the Authority responses to the violations identified in Appendix A of the subject Inspection Report.

Very truly yours,

  
John C. Brons  
Resident Manager

RAS/jd  
Attachment

cc: Mr. T. Rebelowski  
Resident Inspector  
U.S. Nuclear Regulatory Commission  
P.O. Box 38  
Buchanan, New York 10511

State of New York )  
County of Westchester) ss.:

On this 13th Day of February, 1981 before me personally appeared John C. Brons, to me known and known to me to be the person who signed the above letter.

8104080 553

  
RUTHANNE B. BOWMAN  
Notary Public, State of New York  
No. 4651904, Westchester County

ATTACHMENT I

INSPECTION 50-286/80-20

POWER AUTHORITY OF THE STATE OF NEW YORK  
INDIAN POINT 3 NUCLEAR POWER PLANT  
DOCKET NO. 50-286  
FEBRUARY 13, 1981

#### VIOLATION A

The Post-Maintenance Test conducted under Work Request No. 1352 dated November 12, 1980, was not performed in accordance with the steplist in that required continuity checks were not performed for switches numbered 11 through 13 and parts of the required continuity checks were not performed for switches numbered 1, 4, 5, 6, and 7. Also there was no indication of supervisory review for satisfactory completion of the work required by the steplist.

#### RESPONSE

The objective of the continuity checks issued as part of Modification Procedure Change MPC-003 EL to Modification Procedure MOD 79-03-123 EL was to perform a preliminary verification of the wiring of the subject switches prior to the interconnections with their associated systems. The testing requirements as per MPC-003 EL were performed for switches 1 through 10, and discrepancies were identified and corrected. Based on the results of the Continuity Test and the initiation of the Functional Testing of the Modified Systems, it was determined that the remaining Continuity Checks required by MPC-003 EL were no longer required. The Administrative actions to delete the remaining checks for switches 11 through 13 required by MPC-003 EL were not completed.

The System Functional Test No. 00285 was the acceptance test of the completed modified system which considers the interaction of the associated systems to ensure proper operation. Parts of this test on the alternate shutdown instrumentation verified the proper operation of switches 11 through 13 and the results of this part and all parts of this test were reviewed and meet the established acceptance criteria.

An Administrative Procedure is in the process of being written on the subject of retests of system that will provide the necessary administrative controls and checks to prevent the recurrence of an item similar to the items identified in this violation. This Administrative Procedure is expected to be issued during the month of May 1981.

## VIOLATION B

There is no objective evidence that Modification Procedure MOD 79-03-028 RCS, Manual Isolation Valves for Pressurizer Spray Valves, Revision 0 of September 15, 1979, was reviewed or approved by Engineering (NYO) prior to implementation. Furthermore, there is no objective evidence that Modification Procedure Change MPC-002 RCS, which did not change the scope or intent of the Modification Procedure, had been reviewed by PORC after implementation.

## RESPONSE

The modification to the system that was performed in accordance with the above referenced Modification Procedure was reviewed by Engineering (NYO) prior to the issuance of the formal Modification Procedure by the Site. The Engineering Documents that were prepared by the Authority's Architect/Engineer for this modification were forwarded to Engineering (NYO) and the site's Technical Services Department for review. This review was performed prior to the issuance of the formal Modification Procedure, but the signed approval of this Modification Procedure by Engineering (NYO) was not obtained partly due to a signature mistakenly placed on the line for Engineering (NYO) and subsequently lined out. This Modification Procedure was also distributed to Engineering (NYO) upon issuance of this procedure for implementation.

The referenced Modification Procedure has been signed as approved by Engineering (NYO) with no objections of the final design of the system.

The Authority's Technical Services Staff had identified that a problem similar to the one referenced in this violation concerning MPC-002 RCS could occur and had taken appropriate steps to prevent this situation from occurring. The action taken was to have the Operating Documents Coordinator forward copies of the Modification Procedure Change both to the PORC Secretary and the Technical Services Superintendent to ensure that the required PORC review is completed within the required fourteen (14) days. This Modification Procedure Change which did not receive the required PORC Review was issued prior to the establishment of the above mentioned controls.

The referenced Modification Procedure Change was subsequently reviewed by PORC.

Administrative Procedure No. AP-12, Modifications, is in the process of being revised to include the necessary administrative controls and checks to ensure that the items identified in this violation do not recur. The revision to this Administrative Procedure is expected to be issued during the month of February 1981.