

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  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

ATT: Mr. Eldon J. Brummer  
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

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

ORIGINAL

8104030 557

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 required checks were performed for switches 1 through 10 and discrepancies were identified. These discrepancies were reviewed by the cognizant engineer and they were determined to involve the wiring for alarm points. The necessary steps were taken to complete the wiring to correct the discrepancies. The proper operation of these alarm points were verified as part of the system functional Test No. 00285. Part VIII, and the results of this part of the test meet the acceptance criteria.

The system Functional Test No. 00285 was the acceptance test of the modified system which considers the interaction of the associated systems to ensure proper operation. The part 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 reoccurrence 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 <sup>was</sup> is performed prior to the issuance of the formal Modification Procedure.

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

The review of modification procedure changes that do not change the intent or scope of the modification procedure by PORC is required to be obtained within fourteen (14) days after implementation. The Authority's Technical Services Staff had identified that a problem similar to the one referenced in this violation could occur and had taken appropriate steps to prevent this situation from occurring.

The Modification Procedure Change referenced in this violation was implemented prior to <sup>the</sup> this identification of this possible situation. In addition to this, the subject Modification Procedure Change issued As-Built Engineering Sketches of the completed installation of the subject modification. These sketches were issued as part of the modification procedure to ensure that the on-going As-Built Drawing Program would reflect actual field conditions.

The referenced Modification Procedure Change has been 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 reoccur. The revision to this Administrative Procedure is expected to be issued during the month of February 1981.