

William J. Cahill, Jr.  
Vice President

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Telephone (212) 460-3819

May 28, 1975

Re Indian Point Unit No. 3  
Docket No. 50-286  
Inspection No. 50-286/75-08

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Penn. 19406

Dear Mr. O'Reilly

In an April 28, 1975 letter to your office, we responded to your letter of April 3, 1975 notifying us of an apparent noncompliance found during NRC Inspection 75-08 of Indian Point Unit No. 3. Per a May 9, 1975 telephone conversation with Mr. McCabe of your office, we agreed to submit a supplemental response elaborating upon corrective actions taken to avoid future noncompliances with procedures. This commitment was documented in your letter of May 13, 1975. The purpose of this letter is to provide the requested supplemental information.

The apparent noncompliance pertains to the lack of signatures for Steps 6.1.7, 6.1.12, 6.1.17, 6.2.1, 6.2.2 and 6.2.7 of Test Procedure INT-TP-4.12.1 (Service Water Functional Test - Dock Area). In our previous response, we noted that the test procedure in question contains verification blanks for certain steps of the procedure and also has attached data sheets, and that all such verification blanks and data sheet items were properly signed. This was indeed the case. The six (6) particular steps mentioned above did not have verification blanks or data sheet items associated with them. Nevertheless, they should have been initialed in the margin of the procedure in accordance with Paragraph 5.1.2 of our "Administrative Guidelines for the Test Program".

The failure to completely follow the "Administrative Guidelines" has been discussed with the involved personnel and we are re-emphasizing to all personnel the need for complete adherence to all procedural requirements of the test program.

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Mr. James P. O'Reilly

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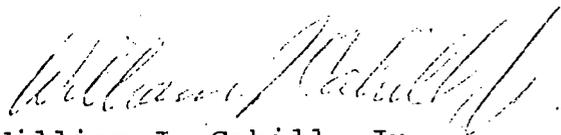
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Regarding the Service Water Functional Test - Dock Area, the entire test procedure and data sheets were thoroughly reviewed by our Nuclear Power Generation, Construction and Engineering Departments upon completion of the test. The review concluded that the test results were satisfactory and that all steps of the test had been performed properly and in accordance with the test procedure.

We have reviewed the "Administrative Guidelines for the Test Program" and have determined that the requirement for margin initialing of all procedure steps is excessive for those test procedures having attached data sheets. We are accordingly modifying the "Administrative Guidelines" as follows: For those test procedures having attached signature verification data sheets, documentation of the performance of procedure steps may be accomplished by signing verification blanks on the data sheets in lieu of margin initialing of each step in the body of the procedure. For those test procedures not having signature verification data sheets, the requirement for margin initialing of each procedure step will be retained. Modification of the "Administrative Guidelines" should be complete by core loading.

We trust that the above adequately describes the corrective actions we have taken. Please let us know if further information is desired.

Very truly yours



William J. Cahill, Jr.  
Vice President

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