

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
REGION I

IE Inspection Report No: 50-286/75-08

Docket No: 50-286

Licensee: Consolidated Edison Company of New York, Inc.

License No: CPPR-62

4 Irving Place

Priority: \_\_\_\_\_

New York, New York

Category: B1

Safeguards  
Group: \_\_\_\_\_

Location: Indian Point 3, Buchanan, New York

Type of Licensee: PWR, 965 MWe (Westinghouse)

Type of Inspection: Routine, Announced

Dates of Inspection: March 19-21, 1975

Dates of Previous Inspection: March 17-18, 1975

Reporting Inspector: T. Rebelowski  
T. Rebelowski, Reactor Inspector

April 1-1975  
DATE

Accompanying Inspectors: E.C. McCabe, Jr. for  
H. Canter, Reactor Inspector

4/1/75  
DATE

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DATE

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DATE

Other Accompanying Personnel: \_\_\_\_\_

DATE

Reviewed By: E.C. McCabe, Jr.

4/1/75

E. C. McCabe, Senior Reactor Inspector  
Nuclear Support Section, Reactor Operations Branch

DATE

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## SUMMARY OF FINDINGS

### Enforcement Action

#### A. Items of Noncompliance

##### 1. Deficiency

Contrary to Criterion V, Appendix B, 10 CFR 50 and FSAR Section 13.4.2, Initial Operations Responsibility, the licensee failed to follow his "Administrative Guidelines for the Test Program," in that six procedural steps were not signed. (Detail 4.b)

### Licensee Action on Previously Identified Enforcement Items

Not inspected

### Unusual Occurrences

None inspected

### Design Changes

Not inspected

### Other Significant Findings

#### A. Current Findings

1. Acceptable Areas (These are areas which were inspected on a sampling basis and findings did not involve an Item of Noncompliance, Deviation or an Unresolved Item.)

- a. Preoperational Tests

The preoperational test procedure status was reviewed.  
(Detail 2)

2. Unresolved Items (These are items for which more information is required in order to determine item status.)

- a. Verification of Approved Procedure Existence

(Detail 3)

3. Deficiency Identified by the Licensee

- a. The licensee identified a Deficiency in regards to the "Administrative Guidelines for the Test Program," in that a procedural step was not signed in test procedure INT-TP-4.1.7 (Reactor Coolant System). (Detail 4)

B. Status of Previous Unresolved Items

1. The following items were reviewed and are resolved.

a. Water Intake and Discharge Velocities

(Reference IE:I Report 50-286/74-19)

(Detail 5.a)

b. Warped Equipment Hatch

(Reference IE:I Report 50-286/74-26)

(Detail 5.c)

c. Decontamination Facilities

(Reference IE:I Report 50-286/74-25)

(Detail 5.d)

2. The following items were reviewed and found to require additional information.

a. Transformer Dike and Fuel Storage Sites

(Reference IE:I Report 50-286/74-19)

(Detail 5.b)

b. Open Items from the CILRT

(Reference IE:I Report 50-286/74-26)

(Detail 5.c)

Management Interview

A management interview was held at the site on March 21, 1975.

Persons Present

Mr. W. Josiger, Test Engineer  
Mr. V. Perry, Jr., Superintendent, Field Operations  
Mr. S. Zulla, Acting Operations Engineer

Items Discussed

A. Preoperational Test Program Status

The inspector stated his findings on the status of the licensee's preoperational test program. The number of completed tests approved by the JTG reflect about 8% of the procedures on the test index. (Detail 2)

B. Inspectors Evaluation of Licensee Completed Test Review

The inspector stated that the licensee's method of delineating untested portions of administratively completed procedures is not readily auditable. (Detail 4.d)

C. Failure to Adhere to Administrative Procedure

The inspector stated that the licensee had one item of noncompliance identified by the inspector in that the licensee failed to sign six of the procedural steps in 4.12.1, Service Water System Functional Test. (Detail 4.b)

D. Unresolved Items

The inspector stated that his review of unresolved items had closed three items. (Details 5.a, 5.c, and 5.d)

## DETAILS

### 1. Persons Contacted

Mr. A. Cheifetz, Director, Radiation Safety  
Mr. J. Cullen, Director of Plant Health Physics  
Mr. T. Ferraro, Nuclear Environmental Monitor  
Mr. F. Hertrich, CRI  
Mr. E. Imoimbo, HP Supervisor  
Mr. W. Josiger, Test Engineer  
Mr. V. Perry, Jr., Superintendent, Field Operations  
Mr. W. Stein, Manager, Nuclear Power Generation Department  
Mr. R. Van Wyck, Manager, Nuclear Services  
Mr. S. Zulla, Acting Operations Engineer.

### 2. Status of Preoperational Test Program

#### a. Preoperational Test Procedure Preparation

The licensee has prepared and approved 105 of the 112 procedures on the preoperational test index.

#### b. Licensee Evaluation of Results of Completed Preoperational Test Procedures

- (1) The Joint Test Group has reviewed and accepted the results of 10 preoperational procedures.
- (2) The licensee is presently reviewing the results of 30 preoperational test procedures that have been approved by WEDCO.
- (3) The licensee is presently determining the following items:
  - (a) Status of tests under performance.
  - (b) Review of test index to determine the requirement for the completion of tests necessary to support initial fuel loading.
  - (c) Results of preoperational tests that require completion prior to fuel loading.

The preoperational program status will be reviewed during a subsequent inspection.

3. Verification of Approved Procedure Existence

Reference: IE:I Inspection Report 50-286/74-02, Detail 8

The inspector verified that approved preoperational procedures exist and that test objectives are consistent with test titles. The licensee has developed his procedures in accordance with the INT-ADMIN-1.0, Administrative Guidelines for the Test Program. Draft procedures were reviewed by the licensee and comments resolved prior to JTG approval per paragraph 2.0 of INT-ADMIN-1.0.

The following listing of procedures, with final dates of JTG approval, have been issued by the licensee.

<u>Title</u>	<u>Proc. No. (INT-TP)</u>	<u>Date JTG Approved</u>
8 Switch Sequencing	4.5.1	2-12-75
Accumulator Injection	4.5.2	2-6-75
Spray Pumps and Eductors	4.5.3	1-30-75
Injection Pumps Opn.	4.5.4	2-6-75
Radiation Monitoring	4.7.1	2-27-75
NI Operational Checks	4.7.2	2-28-75
Safeguards Test	4.8.4	3-14-75
SIS and Loss of Power	4.13.3	3-13-75
Boric Acid Heat Tracing	4.13.5	2-21-75

The licensee has not completed his approval of all preoperational tests. This item will be reviewed during a subsequent inspection.

4. Evaluation of Licensee Test Results Review

a. The inspector reviewed the results of the licensee review of the following completed preoperational tests.

INT-TP-4.12.1	Service Water Functional Test - Dock Area
INT-TP-4.12.7	Circulating Water System Functional Test
INT-TP-4.12.25	Instrument Air CCW System
INT-TP-4.5.7	SIS Check Valve Leakage
INT-TP-4.1.7	Reactor Coolant System Cooldown
INT-TP-4.2.3	Pressurizer Level Control
INT-TP-4.12.18	Initial Turbine Roll
INT-TP-4.12.8	Delcing System.

Areas of review included the following items.

- (1) Review of data sheets in areas of:
    - (a) State of completion of all data sheets;
    - (b) Data recorded at proper intervals; and
    - (c) Data verified per licensee Admin. 1.0.
  - (2) Review of test deficiencies.
  - (3) Review of corrective action performance.
  - (4) Acceptance criteria verification by licensee.
  - (5) Test analysis review by the appropriate level of technical expertise.
- b. Contrary to Criterion V, Appendix B, 10 CFR 50 and FSAR Section 13.4.2, Initial Operations Responsibility, the licensee's review of procedure INT-TP-4.12.1 (Service Water Functional Test - Dock Area) failed to address a noncompliance with the licensee's "Administrative Guidelines for the Test Program" in that steps 6.1.7, 6.1.12, 6.1.17, 6.2.1, 6.2.2, and 6.27 were not signed.

This Deficiency was identified by the inspector.

- c. A Deficiency similar to that in paragraph 4.b preceding was identified by the licensee. INT-TP-4.1.7 (Reactor Coolant System Cooldown) step 3.3.2.2 was found unsigned through the licensee's internal audit program. Corrective action was taken in a timely manner on this Deficiency.

No additional information is needed on this item at this time.

- d. A potential problem exists with respect to being able to track follow-up items which were not completed on tests that have been signed off as complete tests. The inspector identified three separate methods of documenting these items with no apparent coordination between the three systems: Blue Sheets, Field Inspection Reports (FIR's), and an Unofficial Test Index.

The possibility exists that safety related tests, required to be performed prior to core loading could, inadvertently, be unreviewed and untested due to the licensee's method of auditing multiple and uncoordinated follow-up systems. This item will be reviewed during a subsequent inspection.

5. Previously Unresolved Items

a. Water Intake and Discharge Velocities

Reference: IE:I Report 50-286/74-13, Detail 8

- (1) The inspectors concerns as reported in reference report are resolved in the following areas.

(a) Data Logging

The inspector reviewed the licensee's log of water height differential between discharge canal level and river level. The log indicated that correct heights were maintained or adjusted to fall within the levels necessary to maintain satisfactory discharge velocities for the periods required by Facility Technical Specifications (Appendix B). Changes in circulating pump speeds were logged.

(b) Water Level Markers

The inspector viewed the river and discharge canal water markers and found them readable. Absence of excessive biological growth was noted.

(c) Unit 3 - SOP-RW-3, Revision 1

The licensee is following the procedural steps of SOP-RW-3, Outfall Structure Operations, which addresses the method of implementation, precautions, limitations and initial conditions necessary to maintain the  $20 \pm 2$ " differential between river and discharge canal levels.

The inspector had no further questions on these items.

b. Transformer Dike and Fuel Storage Sites

Reference: IE:I Report 50-286/74-19, Detail 11

The inspector reviewed the document entitled "Spill Prevention Control and Countermeasure Plan." The document does not address the following.

- (1) Method of culvert runoff containment.

- (2) Overflow of transformer slag pits.
- (3) Method of reducing water accumulation in slag pits.
- (4) The justification that asphalted areas would prevent oil spill runoffs.
- (5) Site plans of Unit 3 transformer locations.
- (6) Details as to dike heights or moats that would contain spilled volumes.
- (7) Fuel tank spill protection of Unit 3.

Additional information is to be developed by licensee for a detailed evaluation of these concerns.

c. Containment Integrated Leak Rate

Reference: IE:I Inspection Report 50-286/74-26

The three (3) unresolved items on report 74-26 were reviewed.

The following item is resolved.

(1) Warped Equipment Hatch (Reference Report, Detail 4.n)

This item was addressed in IE:I Inspection Report 50-286/75-04 and is resolved.

The following items remain unresolved.

(1) Penetration and Weld Channel Pressurization Isolation Valves (Reference Report, Detail 3.f)

Information was not presented in documented form addressing the specific ASME code concerns.

(2) Water Leakage Testing (Reference Report, Detail 3.b)

The licensee stated that the values in the reference do not represent items added to type "C" testing results.

The inspectors' in-house review indicated that justification for this assumption was not adequate.

Additional areas on items in the Reference Report, Details 2.k, 3.c and 3.h will be reviewed during subsequent inspections.

d. Decontamination Facilities

Reference: IE:I Inspection Report 50-286/74-25, Detail 4

The licensee has reviewed his decontamination facility procedure and has written a Decontamination Supply Locker Inventory Minimum Stock Requirements List.

The listing, with restock supply sources, supports the implementation of Indian Point Station, Plant Health Physics Unit, Procedure No. HP-21, Revision 2, "Personnel Decontamination." The inspector had no further questions in this area.