

U.S. ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I

RO Inspection Report No: 50-286/74-07 Docket No: 50-286

Licensee: Consolidated Edison Company License No: CPPR-62

Priority: _____

Category: B1

Location: Indian Point 3, Buchanan, New York

Type of Licensee: PWR 1050 MWe W

Type of Inspection: Routine, Announced

Dates of Inspection: April 16-19, 1974

Dates of Previous Inspection: April 4-5, 1974

Reporting Inspector: *D. F. Johnson*
D. F. Johnson, Reactor Inspector

4/30/74
Date

Accompanying Inspectors: NONE

Date

Date

Date

Date

Other Accompanying Personnel: NONE

Date

Reviewed By: *E. C. McCabe, Jr.*

4/30/74
Date

E. C. McCabe, Jr., Senior Reactor Inspector,
Reactor Operations Branch

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SUMMARY OF FINDINGS

Enforcement Actions

The licensee's administrative controls for review and approval of safety related facility procedures are not in accordance with the requirements of 10 CFR 50, Appendix B, Criterion II. (Detail 2)

Licensee Action on Previously Identified Enforcement Items

Not Inspected

Unusual Occurrences

None Identified

Other Significant Findings

A. Current Findings

1. 87% of Facility Procedures remain to be written. Less than 3% have been approved. (Detail 3)
2. The proposed Facility Procedures program was reviewed for scope of procedural coverage and found to be in conformance with the minimum guidelines set forth in RO Guide 1.33. (Detail 4)
3. Results of review of selected Facility Procedures indicate apparent conformance with ANSI-N18.7. (Detail 5)

B. Unresolved Items

1. The current functioning site operations organization is not in accordance with that depicted in the Technical Specifications and FSAR. (Detail 6)
2. Individual assigned responsibility for record retention is lacking in certain areas. (Detail 7)

C. Status of Previously Reported Unresolved Items

Not inspected. (Initial inspection in this area).

Management Interview

Personnel Attending

Mr. W. Stein, Manager, Nuclear Power Generation
Mr. J. H. Coulch, Station Manager
Mr. R. W. Van Wyck, Manager, Nuclear Services

Mr. F. W. Graham, Plant Engineer
Mr. J. M. Makepeace, Technical Operations Director
Mr. T. Law, Director, Technical Engineering
Mr. R. L. Sims, Technical Operations
Mr. S. G. Salay, Chief Operations, Engineer
Mr. S. H. Cantone, Operations Engineer - Unit 3
Mr. W. A. Monti, Operations Engineer - Unit 1
Mr. G. Wasilenko, Manager, Engineering QA

The following summarizes items discussed.

- A. The Station Nuclear Safety Committee's review of Facility Procedures. (Detail 2)
- B. The completion status of the Facility Procedures Program. (Detail 3)
- C. Scope of procedural coverage of the Facility Procedures Program (Detail 4)
- D. RO:I's review of selected Facility Procedures (Detail 5)
- E. Station Organization. (Detail 6)

DETAILS

1. Persons Contacted

Mr. W. Stein, Manager, Nuclear Power Generation
Mr. J. H. Coulch, Station Manager
Mr. R. W. VanWyck, Manager, Nuclear Services
Mr. F. W. Graham, Plant Engineer
Mr. T. Law, Director, Technical Engineering
Mr. J. M. Makepeace, Technical Operations Director
Mr. S. G. Salay, Chief Operations Engineer
Mr. S. H. Cantone, Operations Engineer - Unit 3
Mr. A. Cheifetz, Director Radiation Safety
Mr. S. Zulla, Engineer - Unit 3
Mr. L. Kawula, Test Engineer
Mr. A. Decker, P.M. Engineer

2. Review and Approval of Facility Procedures

- a. Technical Specifications Section 6.5.1.f.(1) states "The Station Nuclear Safety Committee shall review proposed normal, off-normal and emergency operating procedures; proposed maintenance procedures and proposed changes as determined by the Station Manager, Manager, Nuclear Services or the QA Engineer to be related to nuclear safety."
- b. Technical Specification Section 6 5 1 g 2 further states "The Station Nuclear Safety Committee shall recommend in writing to the Manager, Nuclear Power Generation Department, approval or disapproval of proposals under item f.(1).
- c. Station Administrative Order 102, Rev. 2 appears to be in conflict with the above requirement in that it states in part "That if a procedure/procedure change clearly does not involve an unreviewed safety question, in the opinion of the appropriate subsection head, approval by him is sufficient. Once approved the procedure/procedure changed may be issued for implementation with a copy sent to the Chairman of the Station Nuclear Safety Committee".
- d. Unit 3 Procedure 3AD 19 states "The Chief Operations Engineer has final approval of procedure/procedures changes, if in his judgement, an unreviewed safety question is not involved nor is pre-implementation review by the Station Nuclear Safety Committee or Nuclear Facilities Safety Committee required".

- e. In addition, the inspector verified that procedures having safety significance have been approved for use without review or evaluation by the Station Nuclear Safety Committee (SNSC). To meet the requirements of 10 CFR Part 50, Appendix B and the licensee's Technical Specifications all initial safety related procedures and changes to (not merely those that involve an unreviewed safety question) should be reviewed by (SNSC) and written recommendations and evaluations be provided to the Manager of Nuclear Power Generation prior to final approval and implementation.
- f. The licensee stated all safety related procedures will be reviewed by SNSC prior to fuel load of Unit 3.
- g. The present administrative controls do not meet the requirements of 10 CFR Part 50 Appendix B Criterion II and also do not comply with the licensee's technical specification proposal which is a basis for the licensee's application for an operating license. The inspector noted this situation pertains to the entire station, not merely to Unit 3, and is also of concern throughout plant life.

3. Completion Status of Facility Procedures

- a. Information obtained during this inspection indicated the following status of completion regarding the Facility Procedures Program.

	<u>% Written</u>	<u>% Fully Approved</u>
Plant Operating Procedures	0	0
Plant Operating Instructions	0	0
System Operating Procedures	40	3
Preventive Maintenance Procedures	18.5	0
Corrective Maintenance Procedures	0	0
Emergency Procedures	9	0
Alarm Procedures	0	0
Surveillance Test and Calibration Procedures	0	0
Chemistry Procedures	0	0
Health Physics Procedures	0	0
Administrative Procedures	74	0

The inspector stated that Facility Procedures for the administration, operation and maintenance of the facility must be completed and approved prior to licensing. The inspector further noted that, based on the large number of procedures remaining to be prepared and the voluminous amount needing final approval, significant emphasis should be placed on expediting the preparation and approval of facility procedures. The licensee stated that many procedures

previously written and approved for Unit 2 can be utilized for Unit 3. The licensee further stated all procedures will be written and approved by 90 days prior to fuel load.

4. Scope of Procedural Coverage

- a. The inspector examined the licensee's index for proposed facility procedures coverage and determined that the facility procedures program appear broad in scope and found no discrepancies with the minimum guidelines of Regulatory Guide 1.33.

5. Procedure Review

The inspector reviewed the following procedures and provided comments to the licensee.

a. Administrative Procedures

- (1) 3AD-10 "Administrative Directive Review"
- (2) 3AD-11 "Guidelines - AEC site visits"
- (3) 3AD-14 "Preparation of Procedures"
- (4) 3AD-19 "Procedure/Procedure Change Approval Policy"
- (5) 3AD-23 "Watch Relief"
- (6) 3AD-27 "Conduct of Operations"

b. System Operating Procedures

- (1) SOP-RCS-1 "Reactor Coolant Pump Operation"
- (2) SOP-CVCS-4 "Placing the CVCS Demineralizers in or out of Service"

c. Plant Emergency Procedures

- (1) PEP-RPC-1 "Unit Trip"

The inspector stated that he found no inconsistencies in content and format between the listed procedures and the guidelines set forth in ANSI N.18.7. He had no further questions on this item.

6. Station Organization

The licensee has unofficially implemented an organizational change with key managerial functions being performed by individuals in positions who are not depicted in the current Technical Specifications and FSAR.

The licensee has submitted to the Directorate of Licensing a change request for a revised station organization that reflects the current organization.

This issue is unresolved pending action by Licensing.

7. Record Retention

The licensee's administrative procedures should specify the individual(s) assigned the responsibility for maintaining records required by the Technical Specifications.

Unit 3 Procedure 3AD-20, "Document Distribution and Retention" states in part that "clerical forces" will be responsible for maintaining records.

"Clerical Forces" does not specifically or adequately assign responsibility. This item is unresolved.