

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 739.8200



November 7, 1986
IP3-WAJ-057Z
IP3-JAS-079B

Docket No. 50-286
License No. DPR-64

Robert M. Gallo, Chief
Projects Branch No. 2
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

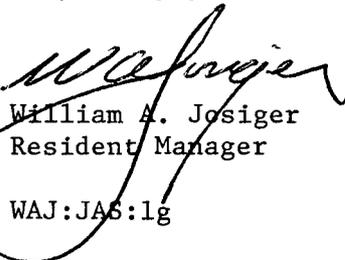
Subject: Inspection No. 50-286/86-15

Dear Mr. Gallo:

This letter is in response to your letter of September 12, 1986 which transmitted routine Inspection Report 86-15. Your letter discussed two concerns identified during inspection 86-15. The Authority was requested to review the details of the concerns presented in the inspection report and respond in writing. Attachment I provides the results of our review.

Should you or your staff have any questions concerning this matter, please contact Mr. M. P. Cass of my staff.

Very truly yours,



William A. Josiger
Resident Manager

WAJ:JAS:lg

Attachment

cc: IP3 Resident Inspector's Office

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ATTACHMENT I

Indian Point 3 has an outstanding group of operators. A great deal of time is spent selecting and training personnel for licensing exams and this is reflected in Indian Point 3's high success rate for passing the NRC licensing exams. Once licensed, the Authority is committed to keeping the operators involved in all plant activities. An appropriate example is the high degree of involvement of operators in the development and review of the new EOPs. The program was developed under the auspices of the Operations Department and not exclusively by an outside consultant. Procedures represent one aspect of the plant protection system. The remainder of that system includes the plant design, construction and, a properly trained and skilled operator. Any procedure is useless during a plant transient without the trained operator to implement it. Operators are trained and licensed not to blindly follow a procedure, but to take the proper course of action during any plant transient.

Inspection Report 86-15 notes that additional emphasis is needed in the area of Emergency Operating Procedures (EOPs) training. The Authority agrees with this position and is committing one hundred twenty hours of additional classroom training in EOPs (to supplement the normal License Operator Qualification Program). This training is to be scheduled in 1987 and is designed to enhance the operator's knowledge of the Emergency Operating Procedures and associated background information. Eighty hours of simulator training (including use of EOPs) will be conducted as part of the License Operator Qualification Program.

The Emergency Operating Procedures Lesson Plans from the Initial License Training are being revised for use in these sessions. They will include the Generic Issues identified in the Executive Volume of the E.R.G.'s, Integrated Usage, and a more thorough presentation of the procedure background, and the reference plant differences.

Seven sessions will be presented to provide an opportunity for all the License Operators to participate. The first session will be held in January with the last session concluding twenty-one weeks later (approximately May 29, 1987).

The second concern that the Authority was requested to review in Inspection Report 86-15 involved a perceived lack of procedural adherence on the part of Indian Point 3 operators. The Authority has reviewed the issue as described in the report and does not agree with the conclusions or the reasoning from which the concern was developed.

The Authority considers any issue of failure to adhere to a plant procedure a serious matter. In Inspection Report 86-15, it is felt that the issue of procedural adherence was not fully evaluated or followed through by the inspectors. The concern as presented in the inspection report was based solely on interviews and discussions with operators. We understand that the nature of the EOPs makes their observation in use impractical, but still there were no simulator evolutions observed or plant walk throughs conducted in the control room to substantiate the inspector's comments. Instead, ten licensed operators were interviewed. First in small group discussions and later,

individually where the operator's opinion of EOPs were solicited regarding their response to a postulated event involving multiple failures. Based on these discussions, the concern that "operators exhibited some resistance to strict procedural adherence" was developed. The Authority does not consider comments made in an informal environment of group discussions and individual interviews as adequate basis for representing a concern as serious as noted in the inspection report (the lack of procedural adherence). While the inspectors concluded that the failure to follow procedures could stem from a "lack of confidence in certain segments of the emergency procedures" the Authority feels that the inspectors did not fully assess or consider the situation, human nature or operator feedback.

Inspection Report 86-15 also notes that operators were not committed to procedural adherence during complex or unusual situations. The Authority considers such hypothetical complex situations inappropriate subject matter for discussion because it is not possible to write a plant procedure to cover all possible courses of a plant accident. The NRC recognized the potential for situations where procedure and technical specification applicability might be questioned. 10 CFR Part 50 was amended in June, 1983 by adding 50.54(x) to clarify when licensees may deviate from a license condition or technical specification in an emergency. The Supplementary Information for 10CFR50.54(x) also presented the Commission's position on the use of procedures during emergencies:

"Special circumstances can arise during emergencies involving multiple equipment failure of coincident accidents where plant emergency procedures could be in conflict, or not applicable to the circumstances. In addition, an accident can take a course different from that visualized when the emergency procedure was written, thus requiring a protective response at variance with a procedure required to be followed by the licensee"

The operating philosophy of Indian Point 3 is in concert with this position.

On a related matter, the inspection report notes that "management guidance as to when operators can deviate from the EOPs or any other operational procedures has not been developed." The Authority feels that adequate guidance is presently provided in the plant Administrative Procedures and does not believe it is necessary to develop additional guidance of this kind. The balance between the responsibilities of a licensed operator to protect the public health and safety and the responsibility to adhere to plant procedures is very clear and needs no further definition. In the Federal Register notice for the proposed 50.54(x) rule, the Commission particularly solicited public comments on a similar point regarding the need for additional guidance when licensees could deviate from license conditions or technical specifications. The Supplementary Information for 50.54(x) notes that most comments received in response to this request were strongly opposed to the Commission providing additional deviation guidance. In response to one comment the Commission stated:

"The Commission agrees with this comment, and feels that any attempt to define in more detail the precise circumstances under which a deviation is permissible is bound to exclude a circumstance where deviation might be entirely appropriate."

In this light, the Authority relies on the expertise and knowledge of our nuclear plant operators to perform their duties responsibly and appropriately during all plant evaluations.