

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



**New York Power
Authority**

August 17, 1987
WAJ-87-046Z
MPC-87-083B

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

Mr. William F. Kane, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: INSPECTION NO. 50-286/87-08
AND NOTICE OF VIOLATION DATED JULY 15, 1987

Dear Mr. Kane:

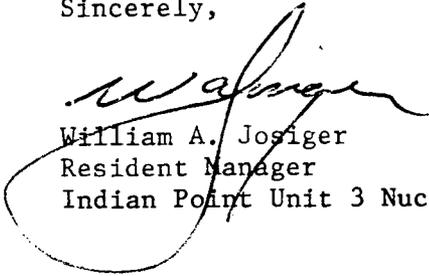
This letter and the attachment provide the Authority's response to NRC Inspection Report No. 50-286/87-08 and the associated Notice of Violation dated July 15, 1987.

The Staff also requested that the Authority respond to the issues identified in Attachment 1 of the Inspection Report. We have reviewed these issues and have determined that due to the efforts associated with the recent Safety System Outage Modification Inspection and completion of our 10-year ISI refueling outage additional time is required to properly address the Attachment 1 items.

Our response to the Attachment 1 issues will be provided on or about November 1, 1987.

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

Sincerely,


William A. Josiger
Resident Manager
Indian Point Unit 3 Nuclear Power Plant

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Attachment

WAJ:MPC:lg

cc: Document Control Desk (original)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Resident Inspector's Office
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

ATTACHMENT 1

VIOLATION

Technical Specification 4.1.A, in item 41 of Table 4.1-1, specifies that the Overpressure Protection System (OPS) be calibrated and tested at settings in accordance with Curve III of Figure 3.1.A-3. This requirement was instituted by Amendment 67, which was issued on August 18, 1986 and was required to be implemented by November 16, 1986.

Contrary to the above, during the period from November 17, 1986 to May 5, 1987, the Overpressure Protection System was not calibrated or tested at the settings specified by Curve III of Figure 3.1.A-3.

RESPONSE

The Authority has reviewed the violation as presented and agrees with the technical concerns of this notice. The circumstances regarding this event are accurately presented in sections 3.2 and 6.4 of the subject inspection report.

The violation resulted from the failure to revise the calibration procedure for the OPS Power Operated Relief Valve control circuit in accordance with Curve III of Figure 3.1.A-3 of the Technical Specifications. This curve was incorporated into the Technical Specifications by Amendment 67. Subsequently the OPS has been properly calibrated in accordance with the

revised limits of Amendment 67. A technical analysis was performed to determine whether operating conditions were such that the reactor vessel was protected against all design basis accidents throughout the cooldown and heatup transients. This analysis reaffirmed that at all times RCS pressure remained below Technical Specification Curves 3.1 - 1 & 2 (Heatup and Cooldown). The reactor vessel did not undergo any stress beyond that of the design specifications and was protected against all design basis accidents.

A review of operating data confirmed that the plant was operated in accordance with the Reactor Coolant System Temperature and Pressure limitations of the Technical Specification.

To prevent similar events in the future, the administrative process by which changes to the Technical Specifications are made and amendments are implemented has been strengthened and formalized. The key element in this process is the identification and tracking of actions necessary for implementation of proposed amendments to the Technical Specifications prior to submitting the amendment request to the NRC. This will ensure plant management is cognizant of required actions upon receipt of an amendment and will result in positive control over the implementation of the amendment. The administrative process described above will be documented in an instruction for use by plant personnel.

The Quality Assurance Department has undertaken an audit of amendments to the Technical Specifications to verify proper and complete implementation. The scope of this audit includes Amendment No. 63 to present. This effort is essentially complete with no additional discrepancies identified to date.