

Indian Point 3  
Nuclear Power Plant  
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November 5, 1987  
WAJ-87-062Z  
MPC-87-107B

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

References: W. A. Josiger letter to R. M. Gallo, dated  
September 24, 1987

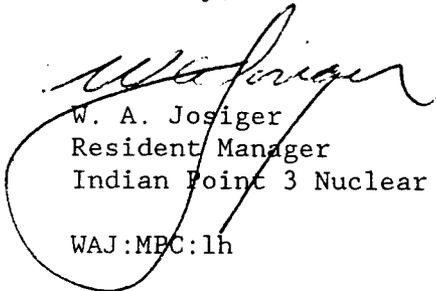
Subject: Inspection No. 50-286/87-08  
dated July 15, 1987

Dear Mr. Kane:

This letter and the attachment provide the Authority's response to the issues identified in Attachment 1 of Inspection Report 50-286/87-08. Item 5 of the attachment also constitutes our response to the staff's inquiry concerning station battery preventive maintenance documented in Inspection Report 50-286/87-17.

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

Sincerely,

  
W. A. Josiger  
Resident Manager  
Indian Point 3 Nuclear Power Plant

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1. Item 87-08-01

Efforts to reduce informality in operating activities, such as control of valve cheaters, log keeping, and shift turnovers.

RESPONSE

Station management is continuing to stress the importance of proper log keeping and shift turnovers. Substantive changes to the shift relief and turnover procedures were instituted following an operating event during Plant startup in September, 1986 where certain control switches were not in the proper position required by the Technical Specifications for the operating mode. The crux of the changes involved the walkdown and review of each control room panel by the counterparts on the oncoming and offgoing shifts. This effort has been very successful and, as noted in Inspection Report 87-08, very effective. The Authority considers the panel walkdowns and counterpart briefings an efficient and effective means of conducting shift turnover.

Proper work practices with regard to manual valve manipulation are communicated to plant operators during initial training which includes hands on training. The continuing training program for plant operators conducted during September/October, 1987 included a module which addressed topics on motor operated and manual valve operation. This program included a laboratory where practical applications were demonstrated. The use of valve "cheater" was specifically addressed in the continuing training program and is covered in the initial operator training program. The continuing training program addressing valve operation is scheduled to be repeated every two years.

2. Item 87-08-03

Plant Operating Procedures do not completely reference Station Operating Procedures.

RESPONSE

The Authority concurs with the staff's findings regarding incomplete reference to more detailed operating instructions in Plant Operating Procedures (POPs). An effort is underway to review all the POPs and include, where appropriate, additional references to Station Operating Procedures (SOPs). This effort will be completed by the end of 1987.

3. Item 87-08-04

Administrative Procedures do not include guidance regarding independent verification of systems.

RESPONSE

To further disseminate this information to plant personnel, Administrative Procedure 21, Conduct of Operations, has been revised to include the basis for independent verification of systems requiring such treatment.

The systems and their associated surveillance tests which require independent verification had been delineated in Operations Department memorandum since 1985. This information was available to all operators in the Shift Supervisors office.

4. Item 87-08-05

Revisions to jumper control program to address temporary modifications.

RESPONSE

The Administrative Procedure which controls the application of jumpers at Indian Point 3 (AP-13) has been revised to address the concerns cited by the inspectors. As noted in the inspection report, programmatic changes to the jumper control system had been under development or implemented prior to the inspection. The salient improvements incorporated into the revised AP-13 include the following:

All jumpers will require a documented technical review. While a technical evaluation has been required by the previous revision of AP-13, documentation of the review was not required. To facilitate the technical review, a technical review form has been added. The form is designed to provide the reviewer guidance regarding the need for detailed written justification for jumpers and whether a proposed jumper is acceptable.

The revised AP-13 also strengthens the process by which a jumper is incorporated into the work control system. This is aimed at improving the timeliness of jumper resolution. Regarding the jumpers installed prior to 1987, those deemed to be permanent will be incorporated into the plant design by the end of the next refueling outage.

Records of jumper installations have been retained since April, 1987, in response to a recommendation by the site Quality Assurance Departments. The revised AP-13 includes provisions requiring retention of completed jumpers, including the technical review documents.

5. Item 87-08-06

Incorporation of station batteries into the preventive maintenance program.

## RESPONSE

The Authority has instituted measures to improve the quality and consistency of the preventive maintenance for station batteries.

In January, 1987, the Performance and Reliability Group within the Technical Services Department at Indian Point 3 assumed responsibility for performing all battery surveillance. The realignment of responsibility is intended to improve the consistency of battery inspections. Personnel from the Performance and Reliability Group were trained specifically on battery theory, monitoring, storage, maintenance, and testing as well as the applicable industry standards for batteries.

Battery surveillance procedures have been enhanced and include weekly inspections for battery material condition. Operability checks are conducted monthly and quarterly which also include material condition verifications. Battery functional test procedures have been revised to incorporate some additional provisions of IEEE Standard 450-1980. Specifically, a maximum limitation on intercell resistance had been added to the Station Battery Load Test procedure. This procedure has been further improved to include a check on the change in intercell resistance and a maximum allowable change between tests. The procedure requires corrective action for battery connections found to have intercell resistance changes of greater than 20% from the previous test.

During the recent refueling outage, all station batteries were completely disassembled, cleaned, reassembled and functionally tested. In the case of Battery No. 34, a new battery was installed. The battery racks were also refurbished as required. Anti-corrosion grease was applied to battery terminals and connectors. Maintenance procedures have been revised to include additional guidance to personnel performing work on the batteries.

### 6. Item 87-08-07

Control of computer generated alarms.

## RESPONSE

The jumper control procedure, AP-13, includes provisions for evaluating changes in computer monitoring of plant parameters. The procedure has been revised to require documented technical reviews of jumpers including alterations to the out of limit checks monitored by the plant computer and elimination of failed monitoring instruments from computer scan.

A periodic review of the computer monitoring points and out of limit checks will be performed by the Instrumentation and Control Department. This will be accomplished by comparing the computer scan and out of limit checks of the master computer to the slave computer to identify any deviations not accounted for.

7. Item 87-08-08

Upgrading of QA observations of in progress operating activities, including administrative procedures and establishment of meaningful goals.

RESPONSE

The Quality Assurance program and its application to operating activities at Indian Point 3 have been evaluated. The Quality Assurance Department includes expertise in the operations area by virtue of staff certified as a Senior Reactor Operator. Additional commitments to enhance the capabilities of the Department in operating activities have been made with one individual enrolled in the current SRO training program and one individual to receive detailed chemistry training in the near future. All Department staff will complete the Technical Staff Training program which includes simulator training.

An Operations Monitoring Program is under development which will provide overview of plant operations activities during various operating modes including startup, shutdown, and refueling. The program as envisioned will cover surveillance testing and normal watch functions. The program is scheduled to be developed by early next year. Implementation of the program will occur in 1988 with existing staff resources and as the Quality Assurance staff completes the training discussed above.