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

New York Power Authority

December 23, 1987
IP3-WAJ-073Z
IP3-JAS-124B

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

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: INSPECTION NO. 50-286/87-24
AND NOTICE OF VIOLATION DATED NOVEMBER 23, 1987

Dear Mr. Wenzinger:

This letter and the attachment provide the Authority's response to NRC Inspection Report No. 50-286/24 and the associated Notice of Violation dated November 23, 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

Attachments

WAJ:JAS:lh

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

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ATTACHMENT I

VIOLATION

10 CFR 50.73(b)(2)(ii)(J)(2) concerning the Licensee Event Reporting (LER) system states that the licensee shall discuss the details of any event caused by a personnel error. In particular, the discussion must include the cause of the personnel error (cognitive or procedural), the details of any procedural errors, any unusual characteristics of the work location that may have contributed to the error, and the type of personnel involved.

Contrary to the above, the licensee failed to include the cause of the personnel error (cognitive or procedural), the details of any procedural errors, any unusual characteristics of the work location that may have contributed to the error, and the type of personnel involved in LER 87-10 which detailed a reactor trip and safety injection cased by a personnel error. Similar deficiencies also existed in the description of personnel errors associated with LERs 87-08, 86-04, and 86-02.

RESPONSE

LER 87-010 will be revised and submitted to the Document Control Desk. Revision 1 will provide additional details concerning the personnel and procedural aspects related to the inadvertent safety injection actuation event that was the subject of LER 87-010.

The Authority recognizes the importance of thorough and complete LERs. To prevent future deficiencies of this kind, formal guidance has been established for use in preparation and review of LERs. To further improve the programmatic controls in this area, a site procedure is currently being developed from the existing guidance document. It will detail the preparation and review of LERs and include instruction for management review of draft LERs including a review check-off sheet. NUREG-1022 , Supplement No. 2, "Licensing Event Report System", various INPO and industry documents are being used as source material in development of this procedure. The comments noted in the August 11, 1987 AEOD Indian Point 3 LER Assessment Report will be carefully considered as part of this effort. The procedure will elevate the cognizance of site personnel to proper LER preparation and ensure the appropriate management involvement. I will be available for use by February, 1988.

The Authority is committed to providing uniform, high quality LERs. We believe the above actions and the increased management attention to these matters will achieve this goal.