

Indian Point 3  
Nuclear Power Plant  
P.O. Box 215  
Buchanan, New York 10511  
914 736.8001



**New York Power  
Authority**

**William A. Josiger**  
Resident Manager

August 30, 1988  
IP3-88-055  
JAS-88-107B

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 I  
475 Allendale Road  
King of Prussia, PA 19406

SUBJECT: Inspection No. 50-286/88-12  
and Notice of Violation Dated August 1, 1988

Dear Mr. Wenzinger:

This letter and attachment provide the Authority's response to the subject inspection report.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'W. A. Josiger'.

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

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cc: Document Control Desk (original)  
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Buchanan, NY 10511

## Attachment A

### VIOLATION

10CFR50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions or procedures which include acceptance criteria. 10CFR50, Appendix B, Criterion XI, requires that test results be documented.

Technical Specification 6.8.1 requires that procedures be established and implemented for the requirements and recommendations of Appendix A of Regulatory Guide 1.33. Section H.2 of Appendix A states that implementing procedures are required for each surveillance test listed in Technical Specifications. Technical Specification 4.1 requires that channel checks be performed.

Contrary to the above, in June 1988 procedures were not in place to implement and document the channel checks required by Technical Specification 4.1 for process monitoring instrumentation.

### RESPONSE

In the past, the Operations Department has utilized the Control Room Operator's normal observance of plant instrumentation as the method of performing instrument channel checks as required by Technical Specification Table 4.1-1. The performance of these observations was confirmed by the inspector during the subject inspection. The criteria for determining operability when comparing channels that measure the same parameter has, in the past, been determined by the operator and his knowledge of the normal daily variations of indication from one channel to the next.

The Authority considered this method of conducting channel checks consistent with the Indian Point 3 Technical Specification's definition of instrument channel checks. Specification 1.9.1 defines channel checks as, "A qualitative determination of acceptable operability by observation of channel behavior during operation. This determination shall include, where possible, comparison of the channel with other independent channels measuring the same variable".

As a result of the Notice of Violation concerning these channel checks a review was performed to determine which plant parameters requiring channel checks were not recorded on the control room logsheet. The following variables were identified:

- 1) RCS subcooling margin monitor
- 2) Redundant accumulator level channel

- 3) Redundant accumulator pressure channel
- 4) First stage turbine pressure
- 5) Reactor coolant flow channels 2 & 3
- 6) Steam line pressure

These items have been incorporated into the control room logsheet. Also, a memo was issued to all Operations Department Licensed Operators stating that all required channel checks are to be documented via the log taking process.

One additional channel check was identified as not being recorded on the control room logsheet, Steam Generator Wide Range Level. Technical Specification Table 4.1-1 lists "Steam Generator Level" as a required channel check. The control room "Hot" logsheet (performed when not in cold shutdown) records the highest and lowest steam generator narrow range level in each steam generator every four hours. The "Cold" logsheet records steam generator wide range level in each steam generator every four hours. Since the wide range level instruments are "Cold Calibrated" and are normally used while filling and draining steam generator's in cold shutdown, it is inappropriate to perform a channel check on these indicators while above cold shutdown when the "Hot Calibrated" narrow range indicators are being recorded and used for level indication.

Plant Procedure(s) will be revised to describe the channel check program. Documenting the performance of channel checks via the control room logsheet will be addressed in the proposed revision(s). In addition, guidance will be provided to the operator for determining operability when comparing channels that measure the same parameter. These procedure revisions will be completed by November 1, 1988.