

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

November 30, 1988
IP3-88-072
JAS-88-137B

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

Mr. L. B. Marsh, Acting Chief
Engineering Branch Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Inspection No. 50-286/88-18

Dear Mr. Marsh:

This letter provides the Authority's response to your
Inspection Report No. 50-286/88-18 dated October 31, 1988 and
received at this office November 7, 1988.

Attachment I to this letter addresses the concerns cited in
Appendix A, Notice of Violation, Of the Inspection Report.

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

Sincerely,

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

WAJ:JAS:lh

Attachment

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cc: Document Control Desk (original)
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

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

APPENDIX A

VIOLATION

10 CFR 50, Appendix B, Criterion V states in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures... and shall be accomplished in accordance with these instructions, procedures..."

1. Licensee Administrative Procedure AP-3, revision 13, section B states: "Procedures applicable to Category 1 and Category M equipment or procedures which pertain to the Environmental Technical Specification requirements shall be reviewed by PORC and approved by the Resident Manager or his designee."

Contrary to the above, on September 30, 1988, the inspector identified the following procedures applicable to Category 1 equipment that were not reviewed by PORC or approved by the Resident Manager or his designee.

- o IC-AD-2 revision 4, Calibration and Control Administrative Directive
 - o IC-AD-7 revision 0, Control of I&C Vendor Technical Manuals
 - o IC-AD-9 revision 0, Storage and Control of Repair Parts and Supplies.
2. Licensee Procedure IC-AD-1 revision 1, item 9 states; "I&C procedures will be reviewed on a biennial frequency to determine if changes are necessary or desirable."

Licensee Procedure AP-3 revision 13, Section III A.7 states I&C procedures will be reviewed on a biennial frequency to determine if changes are desirable.

Contrary to above, on September 30, 1988, the inspector identified the following procedures which had not been reviewed within the biennial period.

- o IC-AD-1 revision 1, last review date August 18, 1986
- o IC-AD-2 revision 4, last review date August 6, 1986
- o IC-AD-4 revision 1, last review date December 31, 1985

- o IC-CM-4 revision 1, last review date August 18, 1986
 - o IC-EP-3 revision 0, last review date January 21, 1986
3. Licensee Procedure IC-AD-2 revision 4, section K states: "Measuring and Test Equipment shall be controlled to assure consistent results of acceptable accuracy. Such controls shall include: Environmental and Handling controls. These controls state that all M&TE is required to be returned to its proper storage location and logged in at the end of each working day."

Contrary to the above, on September 30, 1988, the inspector and the licensee identified 20 items that were missing from the M&TE storage area. The location of these items was unknown to the licensee.

RESPONSE

The Authority has reviewed the above violation, the examples and discussion provided in the body of the inspection report and concurs with the violation as presented. The common element in each example concerns procedural adherence to department administrative procedures. Each example outlines a failure to strictly adhere to an established administrative program. The Authority believes it is important to note that in each example the procedural nonconformance was administrative in nature not a performance related item. The administrative failure did not affect the performance of any quality related activity in relation to either Category I or Category M equipment.

Example 1 concerned a failure to submit for PORC review three procedures providing administrative directions for various programs within the I&C department.

The three procedures in question did not provide instructions relative to the operation, testing, or maintenance of any Category 1 or M equipment, but provided directions, administrative in nature, to personnel in the I&C department. IC-AD-2, IC-AD-7 and IC-AD-9 are lower tier implementing procedures of PORC approved site administrative procedures. Authority personnel had concluded that since the procedures, actually departmental directives, provided instructions implementing established administrative policy that had been PORC approved, additional review was not necessary.

It is clear from this inspection report that it is the NRC position that the Authority should utilize a broader interpretation when considering aspects of Category 1 applicability and interaction when determining which procedures require PORC review. As immediate corrective action, I&C department administrative directives are being reviewed to address similar concerns, appropriate procedures will be submitted for PORC review by January 31, 1989.

As a long term solution to the broader issue of PORC review requirements, the Authority plans to initiate a review of station policy on procedure programs. The purpose of this effort will be to review and strengthen Indian Point 3 procedural practices. Included in this review will be a reassessment of PORC review requirements. The immediate corrective actions will be effective in preventing similar events in the I&C department in the future. The long term improvements are related but can be pursued separately with NRC staff.

Example 2 concerned a failure to conduct procedure reviews within a two year frequency as required by plant procedures. Administrative procedure AP-3 has no tolerance provision for the biennial procedure review frequency. Similar to plant technical specification surveillance intervals, the I&C department had assumed a plus or minus 25 percent review period. Even with this tolerance, two of the procedures in question were overdue and indicate a need for Authority action in this area.

The review of the procedures in question has been completed. In each review no changes were identified that required immediate revision. To prevent future violations of this kind, AP-3 will be revised to require a biennial calendar year review, a procedure revised on July 1, 1988 would be due for biennial review during 1990. A position in the I&C department will be assigned responsibility for tracking review dates of department procedures. AP-3 will be revised to include this clarification by December 31, 1988.

Example 3 concerned control of measuring and test equipment (M&TE) and failure to recognize that issued equipment had not been returned or accounted for in accordance with department directives. The twenty missing M&TE items have been removed from the M&TE listing and are no longer part of the program. To prevent future occurrences of this kind, all I&C technicians have been counselled on the requirements for signing out and promptly returning M&TE to the proper location. Control of M&TE during off-hours will be strengthened by ensuring that the Licensed Required Coverage

(LRC) technician is responsible for issuing M&TE and that it is properly entered in the signout log. This log will be reviewed each morning by the I&C storekeeper who will then initiate corrective action if the equipment has not been returned. Corrective action will include notification to senior department management of the status of any missing M&TE. In addition, the I&C storekeeper will be required to review the signout log at the end of each day to insure that all M&TE has been returned. Missing M&TE will be reviewed and overdue items will be forwarded to senior department management for action. Improvements to the M&TE control program will be completed by December 31, 1988.