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Nuclear Power Plant
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New York Power Authority

William A. Josiger
Resident Manager

February 3, 1989
IP3-89-007
JAS-89-011B

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

Mr. J. P. Durr, 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. 50-286/88-21

Dear Mr. Durr:

This letter provides the Authority's response to your Inspection Report No. 50-283/88-21 dated January 4, 1989 and received at this office January 13, 1989.

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

IE01
1/1

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

ATTACHMENT I

VIOLATION

Licensee Technical Specification, Section 4.6.A.4, Emergency Power System Periodic Tests, Diesel Generators, states in part that, "Each diesel generator shall be inspected and maintained following the manufacturer's recommendations for this class of stand-by service." The manufacturer's maintenance recommendations are contained in ALCO Instruction Manual TPI-899.

Contrary to the above on November 18, 1988, the licensee's maintenance procedures for maintaining the diesel generators and quality of the diesel fuel for the engines did not document or require certain of these maintenance activities in accordance with the recommendations of the manufacturer. Specifically, the licensee's procedures do not address the long term engine maintenance recommendations (beyond one year) for the three, six, and twelve year manufacturer's recommended maintenance for such items as the governor, fuel pumps, turbocharger, and air start motor. Further, the manufacturer's recommendations to prevent/control diesel fuel degradation are not addressed.

RESPONSE

The Authority has reviewed the above violation and agrees that long term, multi year preventive maintenance (PM) programs have not been fully implemented for the Indian Point 3 emergency diesel generators (EDGs).

The Authority had implemented an ongoing preventive maintenance program based on actual service hours, maintenance history and operating environment. All three Indian Point 3 EDGs have limited service hours in the range of 500-600 hours per EDG. The ALCO Instruction Manual does not address maintenance recommendations for such limited run time standby applications. ALCO has acknowledged this to be the case and has been retained by the Authority to enhance the preventive maintenance program for the Indian Point 3 diesel generators. A meeting was held at which time the entire preventive maintenance program was reviewed. At this meeting, a revised standby preventive maintenance program was specifically proposed for the service environment at Indian Point 3. This new service program is presently going through a technical and management review at ALCO Power, Inc. ALCO's approval of the program is expected and should be available to the Authority in early February. The revised Indian Point 3 service program will be issued by ALCO Power, Inc. as an official revision to manual TPI-899.

The Authority's implementation of the new diesel PM program will be accomplished in two phases with the proposed schedule being contingent upon ALCO approval of the Service Program.

Phase I will be Authority incorporation of the new diesel service program. This program will become effective on or before July, 1989. This date was chosen in order to allow sufficient time for initial procedure development, review and approval.

Phase II will include the revision of existing procedures and the development of new procedures as required to meet the requirements of the new diesel preventive maintenance program. Each procedure in Phase II will be revised or developed prior to its scheduled use as per the requirements of the new diesel service program.

With regards to fuel degradation, the Authority has contacted the Mobil, Exxon and Texaco Oil Companies concerning the ALCO recommendations. Based on their recommendations, the Authority will sample and analyze each bulk oil storage tank quarterly for oxidation stability number and filterable solids. This is in addition to normal testing. These tests will be performed by a vendor according to the appropriate ASTM test.

According to each of the contacted fuel suppliers, if the diesel fuel meets the standards of ASTM D-975, has an oxidation stability number $\leq$ 1.5 mg/100 ml and a filtration number $\leq$ 10 mg/l, it is acceptable for use.

A letter describing this program will be sent to ALCO with the recommendation that they modify their maintenance instruction concerning fuel life.

VIOLATION

Licensee Technical Specification, Section 6.8.1 requires that the maintenance procedures referenced in Appendix A of Regulatory Guide (RG) 1.33 be established and implemented to ensure that safety-related equipment will perform their intended function.

Licensee inspection/maintenance procedure 3-PM-R-ES-6, "480 Volt Breaker Inspection" includes the preventive maintenance required for these circuit breakers in compliance with RG 1.33.

Contrary to the above, the licensee failed to implement the preventive maintenance activities required by Procedure 3-PM-R-ES-6 on at least three of the Class 1E 480 VAC circuit breakers during the last required outage frequency interval.

RESPONSE

The Authority agrees with this violation and the discussion in Inspection Report 88-21. The three 480 VAC breakers in question were inadvertently omitted from scheduling during the 1987 outage frequency interval. As noted in the inspection report, the three breakers were inspected during the spring 1988 outage.

To prevent recurrence of incidents of this kind, the Authority has initiated several program enhancements.

In order to accurately track preventive maintenance work performed on 480 VAC breakers, a computer tracking program already in use will be expanded to include 480 VAC breakers, motor control centers, motors and motor operated valves. These additions will be completed in February, 1989.

This program will provide an identification of those components which are due for preventive maintenance on a monthly basis. Any component that requires preventive maintenance during a particular month which was not performed can be identified on an exception report. All preventive maintenances not performed when scheduled must be approved in writing, including a justification for each exception, by the Maintenance Superintendent.

Implementation of the program will occur during the 6/7 Refueling Outage.