

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



William A. Josiger
Resident Manager

July 28, 1989
IP3-89-053

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

Mr. Bruce A. Boger, Acting Director
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406


SUBJECT: Inspection No. 50-286/89-80 and Associated Notice of Violation (89-80-01)

Dear Mr. Boger:

This letter and Attachment I provide the Authority response to the notice of violation (89-80-02) identified in Inspection Report No. 50-286/89-80.

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:RAL/lh

Attachment1

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:

Technical Specifications Section 3.7.F states, in part, "As a minimum, under all conditions including cold shutdown, the following A.C. electrical power sources shall be operable: ... 4. Two operable diesel generators together with total underground storage containing a minimum of 5676 gallons of fuel."

Contrary to the above, No. 33 emergency diesel generator (EDG) was determined to be inoperable on March 23, 1989, because three isolation valves for oil pressure switches OPS1, OPS2, and OPS3 were closed at various times. Thus, since lubricating oil flow through the lines is prevented by the closed isolation valves, the pressure switches sense low oil pressure and prevent the diesels from starting on demand. This condition had apparently existed since the EDG was returned to service on March 4, 1989, following calibration of the switches. Subsequently, No. 32 EDG was out of service for 16 hours on March 7, 4 hours on March 8, and 6 hours on March 10, and No. 31 EDG was out of service for 5 hours on March 11 and 8 hours on March 14. Thus, there was a failure to have two EDGs operable under all conditions as required by technical specifications.

The above is considered a Severity Level IV Violation (Supplement IV).

RESPONSE:

The Authority has reviewed in detail the notice of violation outlined in Attachment A of NRC Inspection Report 89-80 and agrees that this event is a violation of Indian Point 3 Technical Specifications. The reason for the event was a personnel error on the part of an I&C Technician who failed to return the No. 33 EDG to its precalibration configuration. The personnel error was due in part to the usage of an inadequate procedure addressing system restoration.

The corrective actions undertaken as a result of this event are as follows:

- 1) The Superintendent of the I&C Department has conducted a discussion with all department personnel communicating the details of this event and the potential consequences of such actions.
- 2) Procedure changes have been instituted which delineate steps on how systematic restorations of instruments under calibration are to occur. These procedure changes require signed acknowledgement from both the instrument technicians and licensed operators.

- 3) I&C preventative/corrective maintenance (PM/CM) items on the Emergency Diesels will be evaluated to determine the need for diesel operability checks subsequent to the performance of any PM/CM items. This evaluation will be completed by September 15, 1989. Procedure revisions to incorporate recommendations based on the evaluation will be completed by November 1, 1989.

The Authority believes that these corrective actions will be effective in precluding similar occurrences in the future.