

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914-736-8000



August 21, 1989
IP3-89-062
RAL-89-088B

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

Mr. Jacques 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. 50-286/89-11 and Associated Notice of Violation (89-11-01)

Dear Mr. Durr:

This letter and Attachment I provide the Authority response to the notice of violation (89-11-01) identified in Inspection Report No. 50-286/89-11.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. E. Russell'.

Joseph E. Russell
Resident Manager
Indian Point Unit 3
Nuclear Power Plant

JER:RAL/rl

Attachment

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
RESPONSE TO NOTICE OF VIOLATION
89-11-01

VIOLATION:

10 CFR 50, Appendix B Criterion XVI states in part that "... in the case of significant conditions adverse to quality, the measure shall assure that the cause of the condition is determined and corrective action taken to preclude repetition....."

The licensee was cited during the September 1988 inspection (Inspection No. 50-286/88-16) for failure to follow Procedure IC-AD-2 for the controls of Material and Test Equipment (M&TE) tools. 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, as of June 2, 1989, licensee corrective action to preclude repetition of failures to log material and test equipment in accordance with licensee procedure as detailed in Notice of Violation enclosed in the NRC inspection report 50-286/88-18 was inadequate in that 33 additional instances of failure to log M&TE were identified. This repeated failure to follow procedure constitutes inadequate corrective action to preclude repetition of violation.

This is a Severity Level IV violation. (Supplement 1)

RESPONSE:

The Authority has reviewed in detail the notice of violation outlined in Attachment A of NRC Inspection Report 89-11 and agrees that the event occurred as discussed. The Authority believes that this event was not a safety significant concern and although a repeated incident, was administrative in nature. Controls to ensure periodic equipment calibration and checking exist and are adequate to prohibit unauthorized equipment use. The failure to perform the daily check-in of M&TE tools partially resulted from the loss of a store keeper from the Authority's staff. I&C personnel were used on a revolving basis to fulfill the M&TE program requirements. These personnel were inadequately briefed in the performance of these temporary assignments.

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

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- 1) The M&TE Store Keeper position has been filled.
- 2) The responsibilities of M&TE issuance and control have been assigned to the M&TE Store Keeper with access restricted to only the Store Keeper except for the back shift. Specific instructions outlining the issuance requirements of M&TE control procedures have been conspicuously posted at the M&TE issue point.
- 3) Personnel authorized to issue M&TE on the back shift have been reinstructed on their responsibilities regarding adherence to program requirements.
- 4) Personnel authorized M&TE receipt have been reinstructed on their responsibilities regarding adherence to program requirements.
- 5) An evaluation will be undertaken to compare the Authority's M&TE program against the Regulatory requirements. Recommendations resulting from that evaluation will be implemented if necessary by October 15, 1989.

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