

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



**New York Power  
Authority**

**Joseph E. Russell**  
Resident Manager

January 19, 1990  
IP3-90-003  
JC-90-002B

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

Mr. Marvin W. Hodges, Director  
Division of Reactor Safety  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

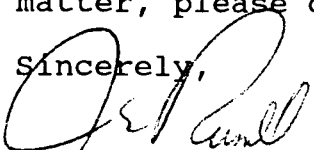
SUBJECT: Inspection No. 50-286/89-20 and Associated Notice  
of Violation (89-20-01)

Dear Mr. Hodges:

This letter and Attachment I, provide the Authority's response to the notice of violation (89-20-01) identified in Inspection Report No. 50-286/89-20 and to the unresolved item (89-20-02) on the requalification program.

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

Sincerely,

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

JER:JC/rl

Attachment

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

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FDR ADDCK 05000286  
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ATTACHMENT I  
RESPONSE TO NOTICE OF VIOLATION  
89-20-01

VIOLATION:

10 CFR 50.54 paragraph (i-1) requires, in part, that the licensee have an operator requalification program which must as a minimum meet the requirements of 10 CFR 55.59 paragraph (c) and that the scope of the requalification program may not be reduced except as authorized by the NRC.

10 CFR 55.59 paragraph (a) (1) requires, in part, that licensed operators successfully complete a licensee developed requalification program.

10 CFR 55.59 paragraph (c) (2) requires, in part, that the licensee have preplanned lectures on a regular and continuing basis throughout the license period.

Contrary to the above, during requalification training week 89.3 the Operations Superintendent was waived by the Resident Manager from attending classes identified in the licensee's requalification training program. This is contrary to 10 CFR 55.59 which requires licensed operators to complete the license developed requalification program preplanned lectures.

This is a Severity Level IV Violation (10 CFR 2, Appendix C, Supplement I).

RESPONSE:

The Authority has reviewed in detail the notice of violation outlined in Attachment A of NRC Inspection Report 89-20 and agrees that the event occurred as discussed. The Authority believes that this event was not a safety significant concern. This was an isolated case of oversight in not recognizing that we could not waive licensed requalification topics. A review of training records reveals that no licensed operator currently holding an active license has been waived from any training.

The following corrective actions have been implemented:

1. The Operations Superintendent made up the classroom portion of week 89.3 by 3 days of directed self study.
2. The Operations Superintendent is scheduled to make up the simulator portion of week 89.3 upon completion of a scheduled simulator upgrade outage. This is currently scheduled for February 1990.

**ATTACHMENT I**  
**RESPONSE TO NOTICE OF VIOLATION**  
**89-20-01**

3. The IP-3 Training Department has implemented a written training policy which prohibits waiver of licensed operator training.

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

UNRESOLVED ITEM (89-20-02):

Although the licensee has not committed to industry standard ANSI/ANS-3.1-1987 or ANSI/ANS-3.1-1981, both the NRC and industry endorse the inclusion of Applicable Industry Operating Events, discussed in these standards, in the licensee's specified requalification training program. Indian Point 3 has not specified this topic as part of their formal requalification training program. This is an unresolved item (50-286/89-20-02).

RESPONSE:

After detailed review of unresolved item (50-286/89-20-02) the Authority concludes that the licensed operator requalification program does specify that applicable industry operating events be included in the curriculum. In the past these modules did not require mandatory attendance. Effective immediately these topics will require mandatory attendance by licensed operators.

The Authority believes this resolves Unresolved Item 50-286/89-20-02.