

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

November 21, 1990  
IP3-90-071  
RAL-90-172B

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

Mr. Curtis J. Cowgill, Acting Chief  
Reactor Projects Branch No. 1  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

SUBJECT: Inspection No. 50-286/90-15 and Associated Notice  
of Violation (90-15-03)

Dear Mr. Cowgill:

Attachment I to this letter provides our response to inspection report No. 50-286/90-15 and its notice of violation (90-15-03).

In your cover letter to the inspection report you asked for a description of our plans for evaluating other switches whose reset function is important to safety. At the inspection exit we stated that the Indian Point 3 (IP3) surveillance, calibration and test programs provide adequate assurance that switches whose reset function is important to safety are tested for function and operability. We believe that this program is sound.

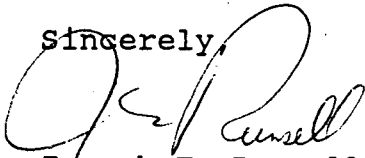
As a result of Violation 90-15-03 we have initiated an evaluation of our calibration procedures. This evaluation will focus on the adequacy of switch reset and is scheduled for completion by June of 1991. Revisions to the calibration program will be made if appropriate.

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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: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

ATTACHMENT I  
RESPONSE TO VIOLATION  
90-15-03

VIOLATION:

10 CFR 50, Appendix B, Criterion V requires, in part, that activities affecting quality be prescribed by procedures that include appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

Technical Specification Section 6.8 requires that written procedures be established and implemented covering the recommendations of Regulatory Guide 1.33, November 1972, Appendix A.

Contrary to the above, as of August 17, 1990:

1. The procedure implemented for calibration of the emergency diesel generator jacket water pressure switches did not include acceptance criteria to verify that the switches would reset when the machines were secured.
2. There was not an established procedure for filling and venting the emergency diesel generator jacket water system.

This is a Severity Level IV Violation (Supplement I).

RESPONSE:

We have reviewed in detail the notice of violation outlined in Attachment A of NRC Inspection Report 90-15 and agree that the events occurred as discussed.

We have completed the following corrective actions:

- 1) An evaluation of the Emergency Diesel Generator (EDG) jacket water pressure switch setpoints has been completed and has determined that the setpoints established are adequate.
- 2) The I&C calibration procedures for the EDG jacket water pressure switches have been revised to include acceptance criteria, which had been omitted, to verify that the switches will reset when the diesels are secured.
- 3) Maintenance Department procedures have been revised to provide procedural direction on the filling and venting of the EDG jacket water system.

ATTACHMENT I  
RESPONSE TO VIOLATION  
90-15-03

- 4) Training on these procedure revisions will be provided to the Instrument and Control (I&C) and Maintenance Department staffs as part of the continuing training program.