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NewYorkPower Authority

William J. Cahill, Jr.
Executive Vice President
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October 17, 1994
IPN-94-132

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Long-Term Corrective Actions Associated with Generic Letter 93-04

References:
1. Generic Letter 93-04, "Rod Control System Failure and Withdrawal of Rod Control Cluster Assemblies," U.S. Nuclear Regulatory Commission, June 21, 1993.
2. Letter IPN-93-109, NYPA to the NRC, "Response to Generic Letter 93-04, Rod Control System Failure and Withdrawal of Rod Control Cluster Assemblies," September 21, 1993.

Dear Sir:

This letter provides the long-term corrective actions that the Authority will take to address NRC Generic Letter 93-04 (Reference 1) for the Indian Point 3 Nuclear Power Plant (IP3). Generic Letter 93-04 notified licensees of an event at the Salem Unit 2 Nuclear Generating Station in which an attempt to insert a bank of control rods resulted in a single Rod Cluster Control Assembly (RCCA) being withdrawn. Due to the significance of this event, certain licensees were required to review their licensing basis, assess the impact of potential single failures in the rod control system on the licensing basis, describe any short term actions taken to address this issue, and provide a plan for the long-term resolution of this issue. In the Authority's 90-day response to Generic Letter 93-04 (Reference 2), the Authority committed to:

1) Evaluate the appropriateness of modifying the Rod Control System current order timing to prevent an uncontrolled asymmetric rod withdrawal; and

2) Based on the above evaluation, advise the NRC of long-term corrective actions.

The Authority has evaluated modifying the Rod Control System current order timing to prevent an uncontrolled asymmetric rod withdrawal. This evaluation concluded that installing the Rod Control System modification proposed by the Westinghouse Owner's Group (WOG) is an appropriate action to take in response to the issues raised in Generic Letter 93-04. Therefore,

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the Authority is committing to install this modification by the end of the current Restart and Continuous Improvement Outage. Subsequent to the installation of the WOG-proposed modification, the Authority will perform testing to identify failures in the Rod Control System which otherwise would have remained unidentified. This testing will verify that the control rod drive mechanism current orders are not corrupted. This testing will be performed during startup from the current outage and every refueling outage thereafter.

The new commitments associated with this submittal are specified in Attachment I. If you have any questions, please contact Mr. P. Kokolakis.

Very truly yours,

William J. Cahill, Jr.
Executive Vice President and
Chief Nuclear Officer
Nuclear Generation

cc: U.S. Nuclear Regulatory Commission
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Attachment I to IPN-94-132

COMMITMENTS RELATED TO

LONG-TERM CORRECTIVE ACTIONS ASSOCIATED WITH GENERIC LETTER 93-04

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

COMMITMENTS RELATED TO
LONG-TERM CORRECTIVE ACTIONS ASSOCIATED WITH GENERIC LETTER 93-04

Commitment Number	**Commitment Description**	**Due Date**
IPN-94-132-01	The Authority will install the WOG-proposed modification which adjusts the timing of the Rod Control System control cards in such a way as to prevent inadvertent rod withdrawal during a demand for rod insertion. This modification will be installed no later than the end of the current Restart and Continuous Improvement Outage.	Restart and Continuous Improvement Outage
IPN-94-132-02 (Supersedes Commitment IPN-93-109-01)	Subsequent to the installation of the WOG-proposed modification, the Authority will perform testing to identify failures in the Rod Control System which otherwise would have remained unidentified. This testing will verify that the control rod drive mechanism current orders are not corrupted. This testing will be performed prior to startup from the current outage.	Restart and Continuous Improvement Outage
IPN-94-132-03	Every refueling outage, the Authority will perform testing to identify failures in the Rod Control System which otherwise would have remained unidentified. This testing will verify that the control rod drive mechanism current orders are not corrupted.	9/10 Refueling Outage