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February 17, 1995
IPN-95-016

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Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Modification and Withdrawal of Commitments to the NRC

Reference: 1. NYPA Letter IPN-93-164 from J. Garrity to NRC regarding Licensee Event Report # 93-052-00, dated December 22, 1993.

Dear Sir:

The purpose of this letter is to withdraw commitment IPN-93-164-03 and modify commitment IPN-93-164-04, made in Reference 1. The bases for these changes are in attachment 1. The Authority modified a commitment in this submittal as shown in attachment II.

If you have any questions, please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,

L. M. Hill
Resident Manager
Indian Point Three Nuclear Power Plant

Attachments
cc: See next page

A001

cc: Mr. Thomas T. Martin
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Indian Point 3 Nuclear Power Plant

Modification And Withdrawal of Commitments to the NRC

Licensee Event Report (LER) 93-052-00 documents a design error involving the installation of a redundant Condensate Storage Tank (CST) level instrument loop (L-1128A) that did not comply with the Regulatory Guide 1.97 single failure requirement. Due to inadequate design verification of the existing CST level instrument loop (L-1128) power supply when performing a modification in 1980, the redundant CST level loop power supply being added was installed in the same channel power source as the existing channel. Failure of the corresponding instrument bus could have adversely affected redundant CST instrument loops.

Two of the commitments made in LER 93-052-00 read as follows:

- The plant design drawings for those control room racks which supply power to multiple instrumentation channels requiring separation to maintain redundancy will be updated to indicate the electrical channel that each device is assigned to. (commitment IPN-93-164-03)

- The original plant design electrical separation implementation criteria will be updated and converted into a permanent plant design guide that can be easily referenced and updated as changes or additions are made in the future. (commitment IPN-93-164-04)

The purpose of the commitments was to help prevent recurrence of the design error reported in the LER. The LER concluded: "The modification process has been improved since the original error in 1980. The Modification Control Manuals (MCMs) were issued a few years ago and peer-checking and self-checking has been encouraged to improve the quality and effectiveness of the modification process. The MCM process requires a vigorous review and independent design review for all modifications involving safety related components. It was during a review process under the current MCM process that the channelization discrepancy described in this LER was discovered. The review was conducted to add a component to the CST level indication loop. The current MCM process coupled with the corrective actions being taken are considered adequate to prevent recurrence."

The Authority is withdrawing IPN-93-164-03 because the existing MCM process will prevent recurrence without the drawing being changed. While the manner that the power supply channelization information was shown on the drawing may have been confusing, now the review and design guidance of the MCM process (i.e., MCM-1, Section 6.3/ MCM-3, Section 6.2/ MCM-5, Section 6.2/ MCM-14, Section 6.3) require design engineers to verify that the power supplies

are independent and consistent with the routing of the cables from the power supplies. Also, the update of the drawing will not be meaningful because the current practice of updating drawings is being changed by the Design Engineering Support organization as part of the Authority's Restart and Continuous Improvement Plan (i.e., Action Plan R-3.1.1.2, "Design Change Process," drawing control issues subtask). The Authority is currently creating a hierarchy of drawings for update consisting of four classes. The range of classes consists of the class A critical (AP-12) drawings which are revised as needed, to class D drawings which are used for reference only and do not necessarily require update. The Design Engineering Support organization classifies the drawings and determines which drawings will require updating. The drawings for channel designation have not been classified yet but they are not critical (Class A) drawings.

The Authority is modifying commitment IPN-93-164-04 to be a long term commitment because update of the electrical separation design guide is not required for the MCM process to prevent recurrence. As noted above, the current MCM process is sufficient to prevent recurrence. The revision to the guide will aid design engineers in the design and modification control processes by making information more accessible. The update of the electrical separation design guide will reflect the proper channel assignments associated with redundant safety related components and equipment as they presently exist. Update of the separation design guide is an integral part of the cable separation program and is listed in the Authority's Restart and Continuous Improvement Plan (i.e., Action Plan R-2.1.2.2, "Outage Management," resolution of hardware issues including cable separation deficiencies subtask) as a long term commitment to enhance plant performance. The modification of the commitment to a long term commitment allows the Authority to focus resources on plant work critical to startup. The Authority will complete this commitment by March 29, 1996.

List of Commitments

Number	Commitment	Due
IPN-95-016-01	The original plant design electrical separation implementation criteria will be updated and converted into a permanent plant design guide that can be easily referenced and updated as changes or additions are made in the future. (This commitment modifies commitment IPN-93-164-04.)	March 29, 1996