



William J. Cahill, Jr.  
Chief Nuclear Officer

March 16, 1995  
IPN-95-036

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
**Start Up Readiness Evaluation**

REFERENCES: 1. NYPA letter IPN-94-063, W. A. Josiger to NRC, "Restart and Continuous Improvement Plan," dated May 27, 1994.  
2. NRC Letter, Thomas T. Martin to R. E. Beedle, "Confirmatory Action Letter 1-93-009, Restart Commitments," dated June 17, 1993.

Dear Sir:

The New York Power Authority has completed its Start Up Readiness Evaluation (SURE) of the Indian Point 3 Nuclear Power Plant. The SURE Program, described in Reference 1, is a series of reviews and self assessments being used to advance the Indian Point 3 plant toward readiness for reactivation. Attachment I is a summary of the evaluation results and Attachment II is a description of items that remain to be completed prior to restart, as requested by Reference 2.

Based on the SURE results and subsequent follow up actions, we conclude that the Authority is prepared for the NRC's Readiness Assessment Team Inspection (RATI). We invite you to begin your inspection on April 3, 1995. After your inspection and receiving comments from the public, we will determine whether to seek authorization to reactivate the reactor itself.

There are no new commitments identified in this letter. If you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. J. Cahill, Jr.', written over a printed name.

W. J. Cahill, Jr.  
Chief Nuclear Officer

Attachments  
cc: next page

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**ATTACHMENT I TO IPN-95-036**  
**START UP READINESS EVALUATION - SUMMARY OF RESULTS**  
**FOR**  
**INDIAN POINT 3 NUCLEAR POWER PLANT**

**INTRODUCTION:**

The Restart and Continuous Improvement Plan (RCIP, Reference 1) was developed by the Authority to define the necessary actions for the restart and long term improved performance of Indian Point 3. The Start Up Readiness Evaluation (SURE) described in the RCIP is the organized framework of assessments and reviews that is being used to demonstrate that Indian Point 3 is ready to be reactivated. This attachment provides a summary of the evaluation results, as requested by Reference 2.

**SURE PROGRAM OVERVIEW:**

The SURE Program consists of four elements:

1. The Startup Evaluation for Readiness Team (SERT) inspection, consisting of a detailed review of restart readiness by a 26 member team.
2. The Operational Readiness Review (ORR), consisting of a self assessment by department managers of the preparedness of their organization to support plant restart and continued safe reliable operation.
3. Quality Assurance Oversight (QAO), including reviews, evaluations, and QA surveillances of RCIP implementation, conducted by the Authority's Appraisal and Compliance Department.
4. System Certification, consisting of field walkdowns, system reviews, and evaluations of open work items to establish the material condition of plant systems.

**SURE RESULTS:**

The results and findings of the evaluation activities (SERT, ORR, and QAO) were presented to senior station and corporate managers for critical review and evaluation. The Authority's Safety Review Committee (SRC) also performed an independent assessment of the evaluation activities. Overall, the Authority determined that significant progress has been made in all areas of corrective actions specified in the RCIP and toward the completion of restart requirements. Follow up actions were developed for those areas identified as needing further attention.

The SERT evaluated 82 topic areas and found that 34 were complete. The remaining 48 were either progressing well to support restart or needed increased management attention. The SERT concluded that one of the six primary root causes and one of the six contributing causes identified in the RCIP had not been fully addressed. The ORR identified 35 issues

needing additional attention, 22 of which require corrective action prior to startup. Five supplemental RCIP action plans, involving 92 individual action steps, were developed as a result of the SERT and ORR. The actions from these supplemental plans which are required prior to exceeding cold shutdown are expected to be completed by April 3, 1995.

The QA Oversight concluded that sufficient improvements have been made to support restart. The need was identified for additional management attention in several areas, including the corrective action program, documentation of personnel roles and responsibilities, and the safety assessment of work items which will remain open at restart.

System Certification is an assessment of systems to demonstrate physical plant readiness for reactivation. The Authority has prepared a System Certification Program Plan, as previously committed to the NRC (Reference 3), which describes the program scope and process. System certification activities required to exit cold shutdown are expected to be complete by April 3, 1995. The Authority will not place any system in service to support a mode change until the certification package is complete as specified in the Program Plan. Remaining activities, which can only be performed during the startup sequence, will be recorded in the completed certification packages and administratively controlled through the Startup and Power Ascension Procedure.

#### CONCLUSION:

Substantial progress has been made toward completing the action items and corrective measures identified by the Authority and the NRC as needed to support the safe reactivation of Indian Point 3. Implementation of the 22 RCIP action plans identified through November 1994 is complete. The supplemental corrective actions and system certification activities needed to exit cold shutdown are expected to be complete by April 3, 1995.

Completing these corrective measures provides assurance that the plant operating organization and technical support staff have the knowledge and tools to prevent, or detect and correct, future problems in a timely manner. In addition, the start up and power ascension plan contains holding periods at mode changes and selected power levels (30% and 90%) to allow for evaluation of plants systems and personnel performance. The Authority concludes that we are prepared to support a readiness assessment inspection by the NRC.

#### REFERENCES:

1. NYPA letter IPN-94-063, W. A. Josiger to NRC, "Restart and Continuous Improvement Plan," dated May 27, 1994.
2. NRC Letter, Thomas T. Martin to R. E. Beedle, "Confirmatory Action Letter 1-93-009, Restart Commitments," dated June 17, 1993.
3. NYPA letter IPN-95-019, L. M. Hill to NRC, "System Certification Program," dated February 23, 1995.

## ATTACHMENT II TO IPN-95-036

### DESCRIPTION OF WORK BACKLOG FOR THE RESTART OF INDIAN POINT 3 NUCLEAR POWER PLANT

The Authority uses several tools to track work activities, including those required prior to plant restart. The following is a summary, as of early March, of selected performance measures which represent the work backlog for restart as requested by the NRC.

#### *Work Requests (WR) and Plant Identified Deficiencies (PID):*

The control of maintenance, testing, and engineering (modification) activities performed on plant equipment is accomplished through the Work Control Process. There are approximately 1300 open WR's and PID's which represent the work remaining on plant equipment for the outage. Less than 600 of these items need to be completed to support plant heatup.

#### *Modification Closeout:*

At the start of the outage there was a significant backlog of modification packages from prior outages which were not closed out. These packages have now been closed. The modifications for the current outage are in various stages of implementation and, as previously committed, the Authority will complete package closeout of all outage modifications within 60 days following the breaker close date.

#### *Temporary Modifications:*

The temporary modification program is used to control short term alterations of equipment or systems. The number of temporary modifications has been reduced to approximately 25, compared to over 100 that were in place at the beginning of the current outage. The Startup and Power Ascension procedure requires that any remaining temporary modifications be evaluated prior to commencing heatup.

#### *Startup ACTS Items:*

The Action and Commitment Tracking System (ACTS) is the database used to track various management and programmatic work items. A subset of work activities which must be completed prior to restart is designated as Startup ACTS Items. Presently there are approximately 108 open Startup ACTS Items. The specific due date or milestone associated with open items may be refined as additional progress toward restart is accomplished.

#### *Control Room Deficiencies:*

The work required to correct identified deficiencies in the control room is monitored by the same programs as other work activities. Certain work requests, PIDs, and startup ACTS items associated with correcting control room deficiencies have been compiled separately to better track work progress in this area. There are currently 29 open items being tracked as control room deficiencies. The Startup and Power Ascension procedure requires that any remaining open items be evaluated prior to commencing heatup.