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NewYorkPower Authority

Robert J. Barrett
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October 11, 1996
IPN-96-109

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Revised Commitment for Boric Acid Heat Trace Log Readings

Reference:
1. NYPA letter (IP3-NRC-92-026) to NRC, regarding Licensee Event Report 92-004 for Boric Acid Heat Trace Circuit Failure, dated April 27, 1992.
2. NYPA letter (IP3-NRC-92-040) to NRC, regarding reply to Notice of Violations, dated July 1, 1992.

Dear Sir:

The New York Power Authority is revising a commitment regarding log readings for Boric Acid Heat Trace (BAHT) circuits. The revised commitment reflects design improvements completed after the original commitment was made. This change is also consistent with the Authority's recent initiative to increase the efficiency and effectiveness Nuclear Plant Operator (NPO) routine inspection rounds.

A Technical Specification required plant shutdown was performed on March 19, 1992, as reported in Reference 1, because of low temperatures indicated on boric acid system piping. A corrective action was established to increase the frequency of log readings for BAHT circuits from every 24 hours to every 4 hours. This condition and related boric acid system deficiencies were also the subject of NRC enforcement action. Corrective actions stated in the Authority's response (Reference 2) to this condition included the increased frequency of log readings.

During 1992 and 1993 the Authority installed several design modifications to improve BAHT performance, reliability and monitoring capability. Modifications included installation of a different type of heat trace cable which more evenly heats the pipe, and installation of improved BAHT temperature recorders. Also, the common alarm in the control room for multiple BAHT circuits can be locally cleared for the circuits associated with routine makeup flow paths. This capability allows expected alarms resulting from routine operations to be monitored and verified locally while the control room alarm remains available to monitor the remaining circuits. A review of records (Deviation Event Reports) since January 1996 indicates that the system modifications have succeeded in improving BAHT performance.

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Also, the new recorders provide temperature trend data which is now redundant with the log readings taken manually during NPO rounds.

Recent efforts to enhance the effectiveness of NPO rounds identified changes which should be made to the BAHT circuit logsheet, including the frequency and type of data collection. The new logsheet is designed to verify at least once per day that the heat trace circuits and temperature recorders are functioning properly. Based on the demonstrated performance of the system design modifications, the revised logsheet will provide assurance that the minimum temperature of boric acid piping needed for safe plant operation and shutdown is maintained.

The Authority plans to implement the new logsheet by December 20, 1996. The revised commitment is stated in Attachment I. If you have any questions, please contact Mr. K. Peters.

Very truly yours,

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Indian Point 3 Nuclear Power Plant

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LIST OF COMMITMENTS

Number	Commitment Description	Due Date
IPN-96-109-01	The Authority will implement a Nuclear Plant Operator (NPO) logsheet that verifies, at least once per day, that the Boric Acid Heat Trace circuits and monitoring recorders are operating properly.	December 20, 1996