

Indian Point 3  
Nuclear Power Plant  
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L. M. Hill  
Resident Manager

April 28, 1994  
IPN-94-052

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop PI-137  
Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
**"Request for Date Extension on Overdue  
Commitments and Commitments Which May be Missed"**

Dear Sir:

The Authority is hereby transmitting a listing of open commitments made to the Commission in various transmittals, enforcement conferences and exit meetings. Attachment I identifies commitments that are currently overdue and commitments which may not be completed on the due date. The Authority is extending the schedules for these commitments to the new dates identified based on a determination that there is no safety significance to the schedule extension.

Per our discussion with members of the NRC on April 20, 1994 the Authority will submit an update of the Authority's Generic Letter 89-10 Motor Operated Valve Program by May 13, 1994. Also, the Authority will submit a revised schedule for the upgrade of the Instrument Air System by June 1, 1994. These commitments have missed commitment dates but are not included in Attachment I.

Attachment II lists the commitments in this submittal.

Should there be any questions regarding this submittal please contact Jim Comiotes at (914) 736-8029.

Very truly yours,

A handwritten signature in black ink, appearing to read 'L. M. Hill', written over a printed name.

L. M. Hill  
Resident Manager  
Indian Point 3 Nuclear Power Plant

Attachment  
cc: See next page

9405110235 940428  
PDR ADDCK 05000286  
P PDR

A064

cc: Thomas T. Martin  
Regional Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

U.S. Nuclear Regulatory Commission  
Resident Inspectors' Office  
Indian Point 3 Nuclear Power Plant

Evaluation of Changes to Commitment Dates

1. Commitment No. IPN-93-156-02 made in NYPA letter  
IPN-93-156 dated December 4, 1993.

**Commitment:**

The Authority will complete the evaluation to determine the extent of the instrument bus power/inverter THD affect on instrumentation, and will modify the instrument power bus/inverter design, and instrumentation if necessary, to ensure the design is within design basis specifications.

**Original commitment date:** 2/14/94

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

Evaluations have been performed to ensure that there is no safety concern in the present plant condition and that instrument operability is maintained. Extension of the commitment to prior to startup will have no safety significance.

2. Commitment No. IPN-93-156-03 made in NYPA letter  
IPN-93-156 dated December 4, 1993.

**Commitment:**

Instrumentation and Control Department will develop and implement a periodic monitoring program for THD on the instrument buses.

**Original commitment date:** 2/14/94

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

The purpose of the periodic monitoring program will be to provide an on going assessment of the design for compliance with design bases. Operation while in cold shutdown has been evaluated (see commitment no. IPN-93-156-02) and there is no safety concern while in cold shutdown. Delay of the monitoring program until startup will have no safety significance.

3. Commitment No. 91-80-07 made in NYPA letter  
IP3-NRC-93-024 dated March 1, 1993

**Commitment:**

Obtain nameplate data from normally energized 120 VAC equipment when made accessible during the cycle 8/9 refueling outage and perform the 120 VAC voltage drop calculations subsequent to obtaining the nameplate data.

**Original commitment date:** 9/30/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

The equipment sustained in the Cold Shutdown Condition is not subject to the voltage drop which may occur during Normal Power Operation. The commitment was to obtain data and perform voltage drop calculations during the 8/9 refueling outage. This work will be done prior to startup from the current outage. There is no safety significance in extending the commitment date.

4. Commitment No. 91-80-10 made in NYPA letter  
IP3-NRC-93-024 dated March 1, 1993

**Commitment:**

Evaluate EDG starting and loading sequences based on data received from the above testing and system simulations.

**Original commitment date:** 9/30/93

**New commitment date:** 2 Months After Startup.

**Safety significance of not meeting commitment date:**

A computer simulation was prepared and no safety significance associated with starting up was identified. A Nuclear Safety Evaluation will be issued for plant startup to justify a safe startup. A Nuclear Safety Evaluation to verify the EDG capability will be prepared 2 months after startup. There is no safety significance involved in extending this commitment date.

5. Commitment No. 91-80-08 made in NYPA letter  
IP3-NRC-93-024 dated March 1, 1993

**Commitment:**

Re-evaluate the results of the short circuit study and determine whether it is necessary to modify the 480 volt breakers for higher short circuit current ratings.

**Original commitment date:** 6/30/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

Reasonable Assurance of Safety, RAS 92-03-150 480V (effective 7/15/92) provides an assurance that there is no safety significance in extending the commitment date. This RAS will expire no later than the end of the cycle 9/10 refueling outage. A NSE will be prepared prior to startup.

6. Commitment No. IPN-93-153-04 made in NYPA letter  
IPN-93-153 dated December 3, 1993.

**Commitment:**

An independent design verification will be performed on the design criteria of the modification installing valves CH-MOV-250A, B, C and D. The balance of the valves installed by this modification will be examined to determine if they are in compliance with the modification design criteria.

**Original commitment date:** 1/14/94

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

There is no safety significance involved since the containment isolation valves are not required until containment integrity is required by Technical Specifications which is prior to startup.

7. Commitment No. IPN-93-157-09 made in NYPA letter  
IPN-93-157 dated December 6, 1993.

**Commitment:**

Enhance oversight of contractor activity by incorporating vendor pre-bid and implementing department checklists into site procurement procedure FIN-SD-01, the site Work Control procedure, AP-9, and in the formal IP3 training program. These checklists will be used to ensure that sufficient and consistent controls are in place during the bid process and prior to implementation of contractor activities.

**Original commitment date:** 12/15/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

Indian Point 3 Station Directive FIN-SD-01, "Direct Material Turnover Requests Including Procurement of Services" was revised on January 7, 1994 to include On-site Vendor Pre-bid Checklist. A station wide compulsory, prototype administrative procedure PAP-1, "Prototype Administrative Procedure for the Control of Vendor Activities" was made effective on 2/1/94. The PAP was written to obtain data from plant personnel on whether the vendor control process has been enhanced. The formal process for vendor control will be implemented upon satisfactorily demonstrating the effectiveness of the vendor control process. In the meantime PAP-1 is in effect. There is no adverse safety significance involved with extending this date.

8. Commitment No. IPN-93-099-13 made in NYPA letter  
IPN-93-099 dated August 27, 1993.

**Commitment:**

The SWS heat trace system will be in full compliance with design requirements by November 30, 1993.

**Original commitment date:** 11/30/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

A Nuclear Safety Evaluation (NSE 93-03-016) was performed which assures that there is no adverse safety significance in extending the commitment date. Also, temporary electrical heaters are used in the vicinity of the areas where heat trace is required.

9. Commitment made in NYPA letter IPN-92-006 dated January 29, 1992.

**Commitment:**

The Authority will review the application of the QA program to the Category M equipment to ensure that the intent of RG 1.155 Appendix A is met. The equipment classification and review of the QA program application will be completed by March 30, 1993.

**Original commitment date:** 3/30/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

The Station Blackout assessment evaluated plant capabilities to safely shutdown if blackout condition occurs from power operation. There is no safety significance in the present plant condition and the action will be completed prior to startup.

10. Commitment made in NYPA letter IP3-NRC-92-079 dated October 26, 1992.

**Commitment:**

The engineering support personnel training program will be implemented by 1/1/93.

**Original commitment date:** 1/1/93

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

The orientation phase and all discipline specific phases of the engineering support personnel training program, except for site engineering, have been implemented. Site engineering personnel are attending the orientation phase of this program while the procedure to implement site engineering discipline specific training is being drafted. Site engineering has sufficient experienced personnel to perform their work. Discipline specific training for engineers is a recent industry initiative that was implemented in 1993. Extension of this commitment does not have any safety implications because engineering is performed in accordance with approved standards and is applied through the Authority's Engineering Program.

11. Commitment No. IPN-93-160-03 made in NYPA letter  
IPN-93-160 dated December 17, 1993.

**Commitment:**

An evaluation is being performed to determine the ability of the plant to maintain core cooling during the period required to restore power to a RHR pump following loss of the 480 volt switchgear due to an earthquake. The evaluation will establish the period available for returning power to the RHR pumps using the equipment powered from the 6.9 KV bus by the 10 CFR 50, Appendix R diesel generator. Conclusions regarding the effects on public health and safety can be made following this evaluation. LER 93-051-00 will be supplemented to discuss the evaluation and conclusions.

**Original commitment date:** 3/21/94

**New commitment date:** Prior to Startup.

**Safety significance of not meeting commitment date:**

The evaluation is required to assess the safety significance of a deficiency identified in LER 93-051. Since the firemain, which provided the potential to render the 480 volt switchgear inoperable during a seismic event, has been isolated and is not required in the present plant condition, a delay in the evaluation has no safety significance.

12. Commitment No. IPN-94-014-13 made in NYPA letter  
IPN-94-014 dated February 3, 1994.

**Commitment:**

Establish Drift Monitoring Program.

**Original Commitment Date:** 3/15/94

**New Commitment Date:** 5/27/94

**Safety Significance of not meeting commitment date:**

The purpose of the Drift Monitoring Program is the monitoring and assessment of the long term effects of increased calibration surveillance intervals on instrument drift. The program will document whether actual future drift values are within the predicted future drift values based on surveillance test data. There is no safety significance involved in extending the commitment date as surveillance testing for the instruments is in place and the Drift Monitoring Program will be established before the next surveillance interval.

**Attachment II  
List of Commitments**

Number	Commitment	Due
IPN-94-052-01	The Authority will complete the evaluation to determine the extent of the instrument bus power/inverter THD affect on instrumentation, and will modify the instrument power bus/inverter design, and instrumentation if necessary, to ensure the design is within design basis specifications. <b>Revises schedule for Commitment No. IPN-93-156-02.</b>	Prior to Startup
IPN-94-052-02	Instrumentation and Control Department will develop and implement a periodic monitoring program for THD on the instrument buses. <b>Revises schedule for Commitment No. IPN-93-156-03.</b>	Prior to Startup
IPN-94-052-03	Obtain nameplate data from normally energized 120 VAC equipment when made accessible during the cycle 8/9 refueling outage and perform the 120 VAC voltage drop calculations subsequent to obtaining the nameplate data. <b>Revises schedule for Commitment made in letter IP3-NRC-024 dated March 1, 1993.</b>	Prior to Startup
IPN-94-052-04	Evaluate EDG starting and loading sequences based on data received from the above testing, and system simulations. <b>Revises schedule for Commitment made in letter IP3-NRC-024 dated March 1, 1993.</b>	2 Months After Startup
IPN-94-052-05	Re-evaluate the results of the short circuit study and determine whether it is necessary to modify the 480 volt breakers for higher short circuit current ratings. <b>Revises schedule for Commitment made in letter IP3-NRC-024 dated March 1, 1993.</b>	Prior to Startup

Number	Commitment	Due
IPN-94-052-06	<p>An independent design verification will be performed on the design criteria of the modification installing valves CH-MOV-250A, B, C and D. The balance of the valves installed by this modification will be examined to determine if they are in compliance with the modification design criteria.</p> <p><b>Revises schedule for Commitment No. IPN-93-153-04.</b></p>	Prior to Startup
IPN-94-052-07	<p>Enhance oversight of contractor activity by incorporating vendor pre-bid and implementing department checklists into site procurement procedure FIN-SD-01, the site Work Control procedure, AP-9, and in the formal IP3 training program. These checklists will be used to ensure that sufficient and consistent controls are in place during the bid process and prior to implementation of contractor activities.</p> <p><b>Revises schedule for Commitment No. IPN-93-157-09.</b></p>	Prior to Startup
IPN-94-052-08	<p>The SWS heat trace system will be in full compliance with design requirements by November 30, 1993.</p> <p><b>Revises schedule for Commitment No. IPN-93-099-13.</b></p>	Prior to Startup
IPN-94-052-09	<p>The Authority will review the application of the QA program to the Category M equipment to ensure that the intent of RG 1.155, Appendix A is met. The equipment classification and review of the QA program application will be completed by March 30, 1993.</p> <p><b>Revises schedule for Commitment made in letter IPN-92-006 dated January 29, 1992.</b></p>	Prior to Startup
IPN-94-052-10	<p>The engineering support personnel training program will be implemented by 1/1/93.</p> <p><b>Revises schedule for Commitment made in letter IP3-NRC-92-079 dated October 26, 1992.</b></p>	Prior to Startup

Number	Commitment	Due
IPN-94-052-11	<p>An evaluation is being performed to determine the ability of the plant to maintain core cooling during the period required to restore power to a RHR pump following loss of the 480 volt switchgear due to an earthquake. The evaluation will establish the period available for returning power to the RHR pumps using the equipment powered from the 6.9 KV bus by the 10 CFR 50, Appendix R diesel generator. Conclusions regarding the effects on public health and safety can be made following this evaluation. LER 93-051-00 will be supplemented to discuss the evaluation and conclusions.</p> <p><b>Revises schedule for Commitment No. IPN-93-160-03.</b></p>	Prior to Startup
IPN-94-052-12	<p>Establish Drift Monitoring Program.</p> <p><b>Revises schedule for Commitment No. IPN-94-014-13.</b></p>	5/27/94
IPN-94-052-13	<p>The Authority will submit an update of the Authority's Generic Letter 89-10 Motor Operated Valves Program. Also, the letter will identify MOV commitments with new commitment dates.</p> <p><b>New Commitment.</b></p>	5/13/94
IPN-94-052-14	<p>The Authority will issue a letter to the NRC submitting a revised schedule for the Authority's upgrade of the Instrument Air System commitments.</p> <p><b>New Commitment.</b></p>	6/1/94