

Indian Point 3  
Nuclear Power Plant  
P.O. Box 215  
Buchanan, New York 10511  
914 736.8001



L. M. Hill  
Resident Manager

May 26, 1995  
IPN-95-060

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

Subject: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Clarification of LER-94-002 Commitment to the NRC

Reference: 1. NYPA Letter, IPN-94-032, dated March 16, 1994, from J. H. Garrity to the U.S. Nuclear Regulatory Commission, regarding Licensee Event Report 94-002-00.

Dear Sir:

The purpose of this letter is to clarify the Authority's intent in commitment IPN-94-032-02, made in Reference 1. The status of the corrective actions for the LER and the bases for the clarification are in Attachment I. There are no new commitments made in this letter.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read 'L. M. Hill'.

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

cc: See next page

9506090146 950526  
PDR ADOCK 05000286  
S PDR

Handwritten initials 'JE22' with a vertical line to the right.

cc: Mr. 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

**Clarification of a Commitment to the NRC**

LER 94-002-00 documented the failure of the RCS Overpressurization (OPS) Trip Train A alarm to annunciate during the performance of a surveillance test. The alarm is required to be operable by Technical Specification 1.92 and TABLE 4.1-1 item 38. The most probable cause of the event was determined to be personnel error while installing the alarm in a 1987 modification. The extended duration of the event was due to an inadequate modification retest and surveillance test.

The Authority made two commitments to take corrective action in LER 94-002-00. This attachment provides the status of commitment IPN-94-032-01 and clarifies the Authority's intent in IPN-94-032-02 as follows:

1. Commitment No. IPN-94-032-01

The Authority conducted a review of surveillance tests required by Technical Specifications to ensure that alarms and trips required for instrument channel functional tests and instrument channel calibrations are properly tested. The Authority will verify the results of this review and revise surveillance tests that are deemed deficient to ensure that all Technical Specification requirements will be met during surveillance and post modification testing.

Status

A review of the surveillance tests required by the Technical Specifications has been completed. This review has identified those procedures which require revision because they did not adequately test the appropriate alarms and trips. The necessary revision have been completed. As a result, surveillance tests properly test alarms and trips required for instrument channel functional tests and instrument channel calibrations.

2. Commitment No. IPN-94-032-02

The I&C Department will review each control room instrumentation rack, supervisory panel, and flight panel to ensure all terminations within electrical termination specifications and regulations.

Status

All CR panels and racks have been inspected (as clarified below) and potential discrepancies documented. All hardware issues have been resolved. As required by our drawing update program, drawing discrepancies will be resolved in accordance with procedure AP 18.8.

Clarification

To address this commitment, the Authority inspected the electrical integrity of instrument wiring on the interface terminal blocks, in supervisory and flight panels, and instrumentation racks (including radiation monitors) in the control room (CR) to ensure the following:

- The wires terminating at the interface terminal blocks, both external and internal, were tight. Loose wire terminations were documented and tightened.
- The wires landing on a particular terminal block matched with the appropriate approved drawing. All discrepancies were documented.

The Authority did not inspect other requirements in applicable electrical termination specifications and regulations for IP3 because this was not necessary for corrective action. Commitment No. IPN-94-032-02 was intended to ensure various plant circuits are functional. The function of plant circuits has been demonstrated by the satisfactory performance of the Surveillance Program, the Site Preventive Maintenance Program and the Periodic Calibration Program. In addition, continual operator interface with CR indicators and controls provides additional assurance that the circuits are operable. For these reasons, the Authority feels that the corrective action taken have been effective and other requirements in applicable electrical termination specifications and regulations need not be evaluated.

For example, Electrical Workmanship Specification, EL-2 contains criteria such as sufficient slack from terminals to modules and torquing of bolted connection, which were not intended to be the criteria necessary to satisfy the corrective action for this event.