

Indian Point 3  
Nuclear Power Plant  
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Robert J. Barrett  
Site Executive Officer

November 18, 1998  
IPN-98-122

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

SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
License No. DPR-64  
**Licensee Event Report #98-004-01, Control Room Ventilation  
System and Component Leakage Design Bases Not Met Due  
To Deficiencies In Input To Surveillance Testing, And  
Clarification of Reply To Notice of Violation 98-81**

Dear Sir:

The attached revision to Licensee Event Report (LER) 98-004 is submitted to clarify the corrective action for surveillance testing. On July 10, 1997, surveillance procedure 3PT-R032C was revised to reflect the acceptance criteria stated in NSE 97-3-270. The revised procedure allowed an air flow of 250 to 400 cfm from outside air, 1330 to 1599 cfm recirculation flow, and a maximum pressure drop across the filter train of 2 inches of water. On October 16, 1997, 3PT-R032C was revised again and the acceptance criteria of 2 inches of water was inadvertently changed to 6 inches of water. Surveillance procedure 3PT-R032C has been taken inactive as an administrative control until it can be corrected. The October 16, 1997 revision of the procedure was used in part for post maintenance testing but this usage did not include the pressure drop acceptance criteria.

The reply to Notice of Violation 98-81, sent to the NRC on July 15, 1998, requires clarification with respect to the above and another issue. This clarification is as follows:

- The response to violation 98-81-01 stated for corrective action that "Calculation IP3-CALC-EL-02563 was revised to incorporate the portions of Calculation IP3-CALC-HVAC-00200 and Technical Services Calculation No. 178 that were not superseded. Those two calculations were then superseded. NYPA has initiated action under the corrective action program to verify that affected documents have been identified and superseded per DCM-2. DCM-2 has been revised so that action of Step 6.7.2 regarding the annotation of affected calculations is a

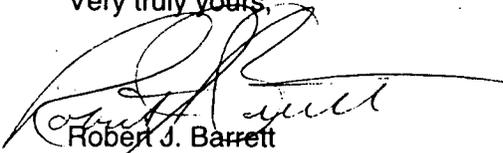
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requirement (i.e., "shall" instead of "should")." This corrective action is clarified by noting that, at the time of the response, the two calculations had not been marked as superseded and that the SEEK data base used to track calculation status had not been updated to indicate the two calculations were superseded. This is now complete.

- The response to violation 98-81-02 stated for corrective action that "On July 10, 1997, surveillance procedure 3PT-R032C was revised to reflect the acceptance criteria stated in NSE 97-3-270. The revised procedure allows an air flow of 250 to 400 cfm from outside air, 1330 to 1599 cfm recirculation flow, and a maximum pressure drop across the filter train of 2 inches of water." This corrective action is the same as that for LER-98-004 and the clarification made to the LER is applicable.

The events described in the above clarifications are under review in our corrective action program. There are no new commitments made by the Authority in this LER. If you have any questions, please contact Mr. Ken Peters at (914) 736-8029.

Very truly yours,



Robert J. Barrett  
Site Executive Officer  
Indian Point 3 Nuclear Power Plant

Attachment

cc: Hubert J. Miller  
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