

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



**New York Power  
Authority**

L. M. Hill  
Resident Manager

June 3, 1994  
IPN-94- 066

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

SUBJECT: Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
License No. DPR-64  
**Reply to Notice of Violation 50-286/94-05**

Dear Sir:

This letter provides the Authority's response to the subject Notice of Violation. The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/94-05. Attachment I is the Authority's reply to the violation. The commitment made in this reply is listed in Attachment II.

Very truly yours,

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

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

See next page for statement of affirmation

000000

9406090165 940603  
PDR ADOCK 05000286  
Q PDR

JEOI

STATE OF NEW YORK

COUNTY OF WESTCHESTER

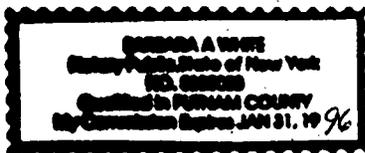
L. M. Hill, being duly sworn, deposes and says:

I am the Resident Manager of the Indian Point 3 Nuclear Power Plant of which the Power Authority of the State of New York is the owner and operator under Facility Operating License DPR-64; I have read the foregoing "Reply to Notice of Violation 50-286/94-05" and know the contents thereof; and that the statements and matters set forth therein are true and correct to the best of my knowledge, information and belief.



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

Subscribed and sworn to  
before me this 3rd day  
of June, 1994.

  
Notary Public

**Reply to Notice of Violation 50-286/94-05**

Violation

During an NRC inspection conducted on February 19, 1994 to March 28, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions "10 CFR Part 2, Appendix C (1993), the violation is listed below:

1. 10 CFR Part 73.55 requires each licensee to provide a security plan approved by Nuclear Regulatory Commission which details the physical protection of the site against acts of radiological sabotage.

The Indian Point 3 Security Plan, dated July 28, 1993, Revision 14, Section 4.7.3 requires in part, that to ensure positive identification, in the event of a failure in the badge/card key system, compensatory measures are provided by the assignment of security officers to vital area portals. These officers control access by providing entry to only those individuals authorized area access by the current access list.

Contrary to the above, during the evening and night shifts from March 5 through March 8, 1994, NYPA did not ensure positive identification or provide adequate compensatory measures for a vital area while the badge/card key system was out of service. Specifically, NYPA posted one security officer within the control room (a vital area) while both control room doors were blocked open. The single security officer was unable to simultaneously monitor both doors, which are over 100 feet apart, to ensure only authorized personnel were granted access into the area.

This is a Severity Level IV Violation. (Supplement III)

Response To The Violation (94-05-03)

The Authority agrees with this violation.

Reason For The Violation

The cause of this violation was due to personnel error, specifically misjudgment. As noted in the inspection report, proper compensatory measures were implemented during the daytime hours and reduced during the evening hours. The Security Shift Supervisors responsible for the reduction in the compensatory measures were attempting to accommodate an increased workload in the other areas of the plant. The Security Shift Supervisors felt that due to the decrease in after-hour entries into the Central Control Room (CCR), the armed Security Officer assigned within the CCR would be able to

conduct adequate access control.

Immediate Corrective Actions Taken

An additional armed Security Officer was posted to provide adequate access control.

Corrective Actions That Will be Taken To Prevent Recurrence

A training packet for Security Shift Supervisors will be prepared to address the findings of this violation (VIO 94-05-03) in order to prevent recurrences. This training will be completed by July 1, 1994.

The Authority was in full compliance for ensuring positive access control to the CCR on March 8, 1994 when the additional Security Officer was posted.

List of Commitments

| Number        | Commitment   | Due Date     |
|---------------|--|--------------|
| IPN-94-066-01 | A training packet for Security Shift Supervisors will be prepared to address the findings of this violation (VIO 94-05-03) in order to prevent recurrences. This training will be completed by July 1, 1994. | July 1, 1994 |