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Resident Manager

January 19, 1995
IPN-95- 004

U.S. Nuclear Regulatory Commission
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SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Reply to Notice of Violation 50-286/94-26-01

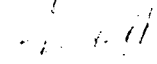
Dear Sir:

This letter provides (in Attachment I) 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 50-286/94-26.

As noted in the attached reply, we agree with the NRC that we did not sufficiently pursue the dual indication of the power operated relief valve position indicating lights. The Authority recognizes that improving the station's human performance remains one of our highest priorities. A human performance enhancement program has been developed and implemented. This program defines expectations and accountabilities for both plant management and staff. This program also provides the mechanisms necessary for monitoring program effectiveness and for ensuring timely intervention and corrective action. A key component of this program is the review of certain performance events by plant management and the parties that were involved in the event in a critique process.

The Authority is making one new commitment in Attachment II. The other commitments in this submittal were previously identified in LER 94-011-01.

Very truly yours,


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

Attachments
cc: See next page

9501250073

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Violation

During an NRC inspection conducted on October 12 to November 14, and on November 21, 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, the violation is listed below:

Technical Specification 3.1.A.8.b(1) requires in part, that the reactor coolant system (RCS) must be depressurized and vented with a 2.00 square inch opening if RCS temperature is less than 332°F and the overpressure protection system is not operable.

Contrary to the above, on October 18 and 22, 1994, for a total of 8 hours and 15 minutes, NYPA failed to maintain a 2.00 square inch opening in the RCS system while conducting testing of the power operated relief valves.

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

Response To The Violation (94-26-01)

The Authority agrees with this violation.

Reason For The Violation

The event that resulted in an RCS equivalent opening of less than 2.00 square inches was due to the failure to fully block open the PORVs. The cause of this event was that the technical information regarding the necessity to block each PORV fully open was not clearly specified, and for that reason the technical information was not included in the operational guidance provided in the plant procedures. A February 9, 1994, memorandum which addressed the equivalent vented opening of one fully open PORV stated that the nominal effective flow area for a PORV is 2.05 square inches, and the memorandum had a limited distribution in the Operations and Technical Services departments.

Contributing to this event were the following:

- No provision is made for a technical review of operating orders that describe how to block open valves that do not possess blocking devices integral to the valves' design.

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- Operations department personnel did not aggressively pursue their questions regarding the size difference between the two sets of blocking devices and the dual valve position indication for RC-PCV-456.
- There was a failure to effectively communicate between departments the critical information regarding blocking the valves fully open.

Corrective Actions Taken

The set of blocking devices to fully open RC-PCV-456 was installed on October 20, 1994, at 0230 hours. On November 27, 1994, the blocking devices for RC-PCV-455C and RC-PCV-456 were replaced, via a temporary modification, with a set of adjustable blocking devices that were fabricated to ensure the valves are fully blocked open.

An Operations shift order was issued on October 25, 1994, to provide the guidance necessary for ensuring the Technical Specification section 3.1.A.8 requirement for a RCS equivalent vented opening of at least 2.00 square inches is maintained.

An evaluation of the extent of condition for operating orders requiring component positioning using blocking devices not integral to the component's design was completed on December 27, 1994. The evaluation found one operating order that required component positioning using devices not integral to the component's design. This operating order provided the adjustable blocking devices for RC-PCV-455C and RC-PCV-456, via a temporary modification, in accordance with the corrective action specified herein.

Administrative Procedure (AP) 10.1, "Operating Orders and Control of Stop Tags, and Locks," has been revised, with a limited term procedure change, to require application of AP-13, "Temporary Modification Procedure," where safety related plant components are positioned using devices not integral to the components' design. This prohibition will not include locks and chains used to prevent components' manipulation or adjustment by personnel.

Corrective Actions That Will Be Taken

The limited term procedure change to Administrative Procedure (AP) 10.1 that requires a temporary modification where safety related plant components are positioned using non-integral devices will be made permanent by February 2, 1995. (This repeats commitment IPN-94-157-02)

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The Operations shift order describing the operational guidance for maintaining an RCS equivalent vented opening of at least 2.00 square inches will be incorporated into POP-4.1, "Operations at Cold Shutdown," by February 2, 1995. (This repeats commitment IPN-94-157-01)

Improvement in interdepartmental communication will be accomplished through the completion of Restart Action Plan, R-2.1.2.1, "Roles, Responsibilities and Interfaces for Restart." This Restart Action Plan is required to be completed prior to plant startup. (This repeats commitment IPN-94-157-03)

This event, including this reply and the Notice of Violation, will be "required reading" for the Operations staff to re-emphasize the need for an aggressive questioning attitude. This will be completed prior to plant startup.

The Date When Full Compliance Was Achieved

The Authority was in full compliance with Technical Specification 3.1.A.8.b.(1) on October 22, 1994, at 1140 hours when RC-PCV-456 was fully opened. In order to assure either PORV could be relied upon to provide the Technical Specification required RCS opening, on November 27, 1994, the blocking devices for RC-PCV-455C and RC-PCV-456 were replaced, via a temporary modification, with a set of adjustable blocking devices that were fabricated to ensure the valves were fully blocked open.

List of Commitments

Number	Commitment	Due
IPN-95-004-01	This event, including this reply and the Notice of Violation, will be "required reading" for the Operations staff to re-emphasize the need for an aggressive questioning attitude. This will be completed prior to plant startup.	Prior to startup