

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



L. M. Hill
Resident Manager

January 30, 1995
IPN-95-008

U.S. Nuclear Regulatory Commission
Document Control Desk
Mail Stop P1-37
Washington, D.C. 20555

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Revised Reply (Partial) to Notice of Violation Associated with
Inspection Report Numbers 50-286/93-22, 93-27, 93-29, and 93-81

- References:
1. NRC Letter, C. J. Cowgill to L. Hill, dated September 27, 1994, "NRC Inspection Report No. 50-286 / 93-22 / 93-27 / 93-29 / 93-81."
 2. NYPA Letter, IPN-94-069, L. M. Hill to USNRC, dated June 8, 1994, "Reply to Notice of Violation Associated with Inspection Report Numbers 93-22, 93-27, 93-29, and 93-81."
 3. NRC Letter, T. T. Martin to W. Josiger, dated April 26, 1994, "Notice of Violation (NRC Inspection Report Nos. 50-286 / 93-22, 27, 29 and 81)."
 4. NRC Letter, R.W. Cooper II to J. Garrity, dated January 5, 1994, "Notice of Violation (NRC Inspection Report Nos. 50-286 / 93-27)."

Dear Sir:

This letter responds to the request of Reference 1 that the Authority reassess actions related to an extent of condition review. Specifically, the Authority has reassessed the reply made in Reference 2 to Violation I, example I.3, in the subject Notice of Violation (Reference 3). A revised reply, attachment I, replaces the original reply in Reference 2. Additional actions that address the extent of condition include the failure position of devices following loss of instrument air, evaluating pneumatic equipment failure modes during system certification (this revises a commitment in Reference 4), and performing an unavailability analysis of the Control Room Heating,

030082

9502030330 950130
PDR ADCK 0500286
Q PDR

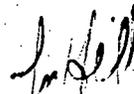
IF 01
11

-2-

Ventilating and Air Conditioning system to identify vulnerabilities.

The commitment made in the revised reply is contained in attachment II. If you have any questions regarding this matter please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,



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

att: as stated

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

Mr. Curtis J. Cowgill, Chief
Projects Branch No. 1
Division of Reactor Projects
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

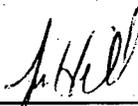
-3-

STATE OF NEW YORK

COUNTY OF WESTCHESTER

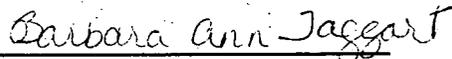
L. M. Hill, being duly sworn, deposes and says:

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 " Revised Reply (Partial) to Notice of Violation Associated with Inspection Report Numbers 50-286/93-22, 93-27, 93-29, and 93-81" 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 30 day
of January, 1995.



Notary Public

BARBARA ANN TAGGART
NOTARY PUBLIC, State of New York
No. 4851437
Qualified in Putnam County
Commission Expires Jan. 27, 1996

Example I.3 - CCR Ventilation System Design - Loss of Instrument Air

"The CCR air conditioning system, as stated in FSAR Section 9.9.2, was designed so that the functional capacity of the control room is maintained at all times. The design condition for maintaining functional capacity of the control room dictated that the ambient temperature for safety equipment located in this room shall not exceed 120 degrees F for short term operation associated with a loss of one air conditioning unit. However, on October 23, 1993, the licensee identified that upon loss of instrument air to the CCR ventilation system, various dampers fail in undesirable positions rendering the CCR HVAC system incapable of performing its design function of maintaining its functional capacity, a condition that has existed since initial plant startup."

Response to Example I.3

NYPA agrees with the example.

The event was caused by personnel error of an indeterminate origin during the system design. The architect engineer did not evaluate this failure mode during initial design or when upgrading the CCR HVAC system from a non safety system to a safety system prior to initial operation.

The Authority's Modification Control Manual (MCM) program procedures require the failure modes for equipment to be analyzed. The MCM program was not in place at the time of this design and installation. Adherence to this MCM program assures that this event will not occur in future modifications.

The Authority will take additional corrective actions to avoid further violations of this type. These corrective actions are presented below.

Prior to startup, the Authority will install a backup gas supply to operate the damper actuators, for a minimum of 24 hours, in the event of a loss of Instrument Air to the Control Room Ventilation System's Damper Actuators. (This repeats commitment IPN-94-007-01.)

Prior to startup, the Authority will revise the System Operating Procedures (SOPs) and Emergency Operating Procedures (EOPs) related to the Control Room Ventilation System to guide the operator on the failure position of the damper actuator and the possible corrective actions (manual damper positioning) that they can perform. (This repeats commitment IPN-94-007-02.)

The above corrective actions were identified based on LER 93-045 which reported violation I, example I.3. A reassessment of the extent of condition has resulted in the following:

- The Authority has performed a comprehensive evaluation of the failure mode

position of air operated devices in safety-related systems, e.g., AOVs, SOVs, and dampers. The engineering report associated with that effort is presently undergoing final internal review and approval in the Authority. This evaluation is currently identified in commitment IPN-94-065-04.

- The Restart & Continuous Improvement Plan committed to a system certification as one element of the Start Up Readiness Evaluation program. The system certification performed as one element of the Start Up Readiness Evaluation program will include an evaluation of pneumatic equipment failure modes on a system basis for each of the forty-three (43) systems being certified. The system certification effort will be completed prior to restart.

This assessment revises the originally planned scope of the failure modes assessment which Inspection Report 50-286/93-27 identified as a commitment (i.e., "As long term corrective action, the licensee committed to have the system engineers review all Category I systems to determine that all pneumatic, electrical, and hydraulic components fail in an acceptable position. Verification of the failure position is to be performed by field inspection or review of test results.").

- LER 94-005, submitted after the response to Violation I, example I.3, identified a deficiency in the control circuits for the compressors. The extent of condition for that event included an unavailability analysis for the CCR HVAC system in order to identify any other susceptibilities of the CCR HVAC system. The Authority performed an unavailability analysis on the CCR HVAC system, assessed identified vulnerabilities and found no deficiencies that had not been reported. (This closes commitment IPN-94-077-03).

The Authority will be in full compliance prior to startup. The installed backup gas supply will allow damper actuators to be operated as required in the event of a loss of Instrument Air. The evaluation of extent of condition assures that related deficiencies are identified and addressed.

List of Commitments

Number	Commitment	Date Due
IPN-95-008-01	The system certification, performed as one element of the Start Up Readiness Evaluation program, will include an evaluation of pneumatic equipment failure modes on a system basis for each of the forty-three (43) systems being certified.	Prior to startup