

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



L. M. Hill  
Site Executive Officer

September 27, 1995  
IPN-95- 099

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  
**Reply to Notice of Violation 50-286/95-12-01**

Dear Sir:

This letter provides the Authority's response to the subject Notice of Violation. The response is provided in Attachment I. The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/95-12 dated August 28, 1995.

The Authority recognizes that the corrective actions implemented as a result of the previous events of this type have not been effective in preventing recurrence. The Authority believes the corrective actions delineated in this reply will result in improved performance in the area of protective tagging.

The commitments made by the Authority in this letter are contained in Attachment II.

Very truly yours,

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

L. M. Hill  
Site Executive Officer  
Indian Point 3 Nuclear Power Plant

Attachments

cc: see next page

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9510020187 950927  
PDR ADOCK 05000286  
Q PDR

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

Mr. Richard W. Cooper, II, Director  
Division of Reactor Projects  
Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

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

## Reply to Notice of Violation 50-286/95-12

### Violation

During an NRC inspection conducted on July 11 to August 7, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

Indian Point 3 (IP3) Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," November 1972. Section A of Appendix A to Regulatory Guide 1.33 requires that administrative procedures be established for equipment control. IP3 Administrative Procedure (AP)-10.1, Revision 13, "Protective Tagging," states that components with Hold Tags shall not be manipulated or removed.

Contrary to the above, on August 1, 1995, the movable incore detector system power supply switch was operated with a Hold Tag attached during reactor flux mapping. This resulted in the power supply switch being placed in the on position while the attached Hold Tag required the switch to be in the off position.

### Response to the Violation (VIO 95-12-01)

The Authority agrees with this violation.

### Reason for the Violation

The event that resulted in a violation of AP-10.1, Revision 13, "Protective Tagging" was discovered on August 1, 1995, during the performance of a monthly flux map that was being conducted in accordance with procedure RA-11, Revision 9, "Power Distribution and Hot Channel Factor."

While performing the flux map, the control room operators noted that the movable incore detector power supply switch had been operated with a "Hold" tag on it. Deviation Event Report (DER) 95-1759 was written to document the event and to investigate the circumstance surrounding it. The incore detector system is operated during the flux mapping process in accordance with procedure RA-11.2, Revision 0, "Movable Incore Instrumentation." Step 4.1.2 of procedure RA-11.2 required the Instrument and Control (I&C) technician to place the power supply switch to the "On" position. Although this switch was in the "On" position as required by RA-11.2, the operators noted that the switch still had a "Hold" tag on it which required the position to be in the "Off" position. After the identification of the tag on the switch, operations personnel authorized the temporary removal of the tag. The tag was removed by the I&C technician and the flux map was continued. No personnel were in the vapor containment

### Reply to Notice of Violation 50-286/95-12

during this event; therefore, the safety of plant personnel was not jeopardized by the improper manipulation of the switch.

Previous to this event, on July 21, 1995, the existing "Do Not Operate" tag on the switch was replaced by a "Hold" tag. Under a previous revision to AP-10.1, a "Do Not Operate" tag could be used to provide additional information or direction about a specific plant configuration. In this particular case, the "Do Not Operate" tag on this switch permitted manipulation of the switch by I&C technicians.

The reason for this violation is that the technician made the wrong assumption when he did not recognize the change in the tag and did not impose self-checking when manipulating the movable incore detection power supply switch. Also contributing to this event were the following:

- The technician involved with this event had performed numerous flux maps in previous years. Habit intrusion played a part in his actions as they pertain to this event.
- Operations department personnel on shift were not aware that a "Hold" tag was applied to the movable incore detector power supply switch versus a "Do Not Operate Tag". This information led the technician to assume that flux map operations could proceed.

There were previous station DERs which addressed additional tag-out concerns. The corrective actions for these events included the formulation of a new protective tagging order procedure (AP-10.1), specific training on AP-10.1, department-specific tailgate sessions, department-specific procedure revisions, and individual employee counseling.

The corrective actions that were derived from these events were satisfactory in providing short term improvement, particularly for departments in which the earlier events had occurred. These corrective actions, however, did not provide long term improvement and did not address the fact that a wide range of station personnel occasionally may encounter protective tags in the course of performing their assigned duties.

#### Corrective Actions Taken

Operations personnel authorized the temporary removal of the "Hold" tag. The tag was removed by the I&C technician and the flux map was continued.

DER 95-1759 was initiated on August 1, 1995, by the Operations department to investigate this event.

### **Reply to Notice of Violation 50-286/95-12**

The individual and supervisor responsible for this violation received letters to their personnel files.

A memorandum was issued by the Site Executive Officer on September 13, 1995, to all Indian Point 3 personnel which emphasizes protective tagging requirements and establishes station disciplinary policy for tagging procedure violations.

There have been no further violations of protective tagging since this event.

#### **Corrective Actions That Will Be Taken To Avoid Further Violations**

The Operations department will determine if non-Operations department personnel can lift protective tags under certain conditions. This evaluation will be completed by October 6, 1995.

The System Engineering Department's, Reactor Engineering group will revise procedure RA-11.2 to include verification that "Hold" tags are removed from flux mapping equipment. The revision to procedure RA-11.2 will be completed by November 15, 1995.

The Training department is revising the training material for station personnel regarding AP-10.1, "Protective Tagging," and will develop the necessary course content for site wide training that will clearly communicate the Indian Point 3 protective tagging requirements. Course content and the implementation schedule will be developed by October 30, 1995.

#### **The Date When Full Compliance Was Achieved**

Compliance was achieved on August 1, 1995, when the "Hold" tag was removed prior to the completion of the flux map activities.

List of Commitments

Number	Commitment	Date Due
IPN-95-099 -01	The Operations Department will determine if non-Operations department personnel can lift protective tags under certain conditions.	October 6, 1995
IPN-95-099 -02	The System Engineering Department's, Reactor Engineering group will revise procedure RA-11.2 to include verification that "Hold" tags are removed from flux mapping equipment.	November 15, 1995
IPN-95-099 -03	The Training Department will develop course content and implementation schedule for site wide training on AP-10.1, "Protective Tagging."	October 30, 1995