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Robert J. Barrett
Plant Manager

September 16, 1996
IPN-96-103

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

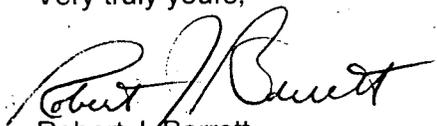
Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Reply to Notice of Violation 50-286/96-07-01

Dear Sir:

This letter provides, in Attachment I, the New York Power Authority's response to the subject Notice of Violation. The Authority agrees with the Notice of Violation contained in NRC Region I Inspection Report 50-286/96-07.

The commitments made by the Authority with this letter are contained in Attachment II. If you have any questions, please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,


Robert J. Barrett
Plant Manager
Indian Point 3 Nuclear Power Plant

Attachments

cc: See next page

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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

Reply to Notice of Violation 50-286/96-07-01

VIOLATION

During a NRC inspection conducted from June 3, 1996 through July 28, 1996, a violation of NRC requirements was identified. The violation, a Severity Level IV, is as follows:

"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 July 22, 1996, the bleed valve downstream of SI-AOV-876B-AS was operated from the position directed by a Hold Tag during maintenance. This resulted in the vent path directed by the protective tagging order being secured."

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Response to Violation

The New York Power Authority agrees with this violation. Contrary to procedure the bleed valve downstream of SI-AOV-867B (AO) was operated from the position directed by a Hold Tag during maintenance.

Reason for Violation

As further described below, the cause of the violation was that the implementation of the protective tagging process was weak in that the protective tagging software program allowed protective tags to have more than one item on one tag, i.e. the required position "Shut Bleed Open" on a protective tag has the operator close the isolation valve to an air regulator, apply the protective tag to the isolation valve, and open the air regulator bleed valve. There were several such software codes that were used in the protective tagging program as standard practice. Additionally the procedure AP-10.1, Protective Tagging, was weak in that it did not prohibit the use of one Hold Tag for 2 items.

The No. 31 Spray Additive Tank Discharge Stop Valve (SI-AOV-867B (AO)) air regulator bleed valve manipulated by Maintenance, during completion of SOV repair, did not have a protective tag, although the bleed valve was included in the protective tagging order for the repair of the solenoid valve. This was in violation of procedure AP-10.1, Protective Tagging. AP-10.1 states "...Components with hold tags shall not be manipulated or removed." The bleed valve was operated without lifting the Hold Tag.

An additional barrier that broke down was that there is a lack of clear written direction of management expectations relative to what constitutes plant equipment that may be operated by maintenance personnel during maintenance activities.

The No. 31 Spray Additive Tank Discharge Stop Valve (SI-AOV-867B (AO)) air regulator bleed valve was manipulated by Maintenance, during completion of SOV repair, as required for applying air to this component. It was the mechanic's understanding that this manipulation could be performed by mechanics. This was in violation of procedure AP-21, Conduct of Operations. AP-21, states "Only Operations Department personnel are authorized to manipulate plant equipment...". "Equipment normally operated by other departments (e.g. chemistry sample valves, etc) or manipulations addressed in approved procedures or work packages are excluded from the requirements...". The work package did not contain written instruction for operation of the bleed valve.

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Corrective Actions Taken

Maintenance Management briefed maintenance mechanics and supervisors on this event, and the requirements of AP-21, Conduct of Operations, were discussed during an open question-answer discussion.

Maintenance Management counseled the maintenance mechanic who manipulated the bleed valve specifically on the requirements of AP-21, Conduct of Operations. Completed 7/24/96.

Operations issued A Shift Order (on 7/24/96 and revised on 7/25/96) including direction to protective tag issuers to not apply protective tags that have more than one item.

Operations removed outstanding protective tags that had more than one item and replaced them with tags for each item. Completed 8/26/96.

Operations ensured the protective tagging program software codes that include more than one item on a tag were deleted. Completed 9/3/96.

Operations revised the administrative controls on protective tagging to prohibit the use of protective tags that have more than one item on a tag. This was implemented with a change to AP-10.1. Completed 8/6/96.

Corrective Actions to be Taken to Avoid Further Violations

Revise AP-21, Conduct of Operations, to include what equipment may be normally operated by plant personnel and clearly communicate these changes to employees. To be completed 11/22/96.

Date When Full Compliance Will Be Achieved

Compliance with the requirements of the tagging order for SI-AOV-867B (AO) was achieved on 7/22/96, in that the bleed valve for SI-AOV-867B (AO) was restored to the open position as required by the protective tagging order. The listed corrective actions are expected to prevent a recurrence.

List of Commitments

Number	Commitment	Due
IPN-96-103-01	Revise AP-21 to better define what equipment may be normally operated by plant personnel.	11/22/96