

ENCLOSURE 1

NOTICE OF VIOLATION

New York Power Authority
Indian Point 3 Nuclear Power Plant

Docket No. 50-286
License No. DPR-64

During an NRC inspection completed on December 15, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires in part that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. Further, in the case of significant conditions adverse to quality, the measures shall assure the cause of the condition is determined and corrective action taken to preclude repetition.
1. Contrary to the above, from October 31, 1997, through December 4, 1997, the licensee failed to promptly identify that placing the 32 or 33 instrument bus on its backup power supply would render the 33 or 31 auxiliary boiler feed pump inoperable and that system operating procedure SOP-EL-2, "Instrument Bus and Plant Computer Static Inverter Operation," did not adequately address the requirement to enter a technical specification limiting condition for operation.
 2. Contrary to the above, from November 15, 1997, to December 15, 1997, the licensee did not take actions to preclude repetition for the inadvertent contamination of the main boiler feed pump control oil by the operation of normally idle portions of the system. The inadvertent contamination caused a secondary system plant transient and a reduction in reactor power on November 15, 1997.
 3. Contrary to the above, from October 23, 1997, to November 3, 1997, the licensee did not promptly correct an identified procedural discrepancy between annunciator response procedure 14, "Panel SLF - Weld Channel," which required that the weld channel containment penetration pressurization system (WCCPPS) be declared inoperable if air leakage exceeded 14.2 standard cubic feet per minute (scfm), and off-normal operating procedure ONOP-CB-2, "Loss of WCCPPS of Isolation Valve Seal Water System," which required the WCCPPS be declared inoperable if leakage exceeded 10.0 scfm.

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

- B. Indian Point 3 Technical Specification 6.8.1 requires written procedures be implemented covering activities referenced in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements," November 1972. Appendix A, Section I of Regulatory Guide 1.33 requires general procedures for the control of maintenance work. Station directive SPO-SD-01, revision 2, "Work Control Process," is a procedure that governs the process of scheduling maintenance

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activities at the facility. Station directive SPO-SD-01 requires that a problem identification description (PID) be generated in accordance with Attachment 6, "PID Tag Details," which required entry of the deficiency description into the reliability on-line maintenance environment computer database.

1. Contrary to the above, in November 1996, a PID, concerning a deficiency associated with excessive boron deposition on the spent fuel pool high level alarm float, was not generated in accordance with Attachment 6, in that the deficiency description was not entered into the reliability on-line maintenance environment computer database.
2. Contrary to the above, in November 1997, seven PIDs, concerning deficiencies associated with cold weather preparations, were not generated in accordance with Attachment 6, in that the deficiency descriptions were not entered into the reliability on-line maintenance environment computer database.

This is a severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, the New York Power Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information.) If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania
this 7th day of January 1997