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

New York Power Authority

Robert J. Barrett
Site Executive Officer

February 6, 1998
IPN-98-014

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 In NRC Inspection Report 50-286/97-10

Dear Sir:

This letter provides, in Attachment I, the New York Power Authority's response to Violations 97-10-01 and 97-10-03 identified in the Notice of Violation included in NRC Region I Inspection Report 50-286/97-10. The Authority agrees with these violations. The Authority does not agree with one of the cited examples in Violation 97-10-01.

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

Very truly yours,

For Robert J. Barrett
Site Executive Officer
Indian Point 3 Nuclear Power Plant

Attachments

cc: See next page

9802190237 980206
PDR ADOCK 05000286
Q PDR

IE01

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

Mr. John F. Rogge, Chief
Projects 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 50-286/97-10-01 and 97-10-03

RESPONSE TO NOTICE OF VIOLATION

New York Power Authority (NYPA) is responding to the Notice of Violation contained in NRC Inspection Report 50-286/97-10 in accordance with the requirements of 10 CFR 2.201. The response addresses the two violations in the same sequence as presented by the Notice of Violation, and provides the reason for the violation or basis for disagreeing with it, the corrective actions taken and results achieved, the corrective actions that will be taken to avoid repetition, and the date when full compliance was achieved.

The cover letter for inspection report 97-10 mentions other past procedure issues; NYPA recognizes this extent of condition. Other recent examples, besides the three listed below, of inadequate work practices and inattention to detail, have been previously recognized as the cause for past problems such as deficient procedures or not following procedures. Human performance is monitored weekly, and trended versus the station overall error goal. A Monthly Integrated Self Assessment Trend Report presents human performance error rates by department, by month, by hours worked and assesses any recent trends. A negative trend is evaluated and actions are taken if needed. Management attention and efforts remain focused on continuously improving our performance and taking corrective action where improvement is not demonstrated.

Violation 97-10-01

"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.

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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)."

Response to Violation 97-10-01

NYPA agrees with this violation. The Authority does not agree with one of the cited examples. The reasons for the violation or basis for diagreement, corrective actions and date of achieving compliance are presented individually for the three cited examples.

Violation 97-10-01, Example number 1

NYPA agrees that the corrective actions were not adequate in recognizing the need to enter a limiting condition for operation action statement when 32 or 33 Instrument bus is on maintenance bypass.

Reason for Violation

The reason for this example is inadequate work practices, failure to identify the need for changes in operating procedures to enter a technical specification limiting condition for operation (TSLCO) action statement for an Auxiliary Feedwater pump when the 32 or 33 instrument bus is on its backup power supply.

A temporary modification separated the power supply to the 33 Auxiliary Boiler Feed Pump controller from the 33 Instrument Bus to the 32 Instrument Bus. The failure to recognize the need to enter a TSLCO action statement, during the approval process of the temporary modification, caused the failure to initiate operating procedure changes. A contributing factor was the misunderstanding that Auxiliary Feedwater System single failure concerns were addressed by Technical Specification 3.7.G, that allows only one instrument bus to be on a backup power supply.

Corrective Actions Taken or To Be Taken

1) On December 12, 1997, operational guidance in the form of a Shift Order was provided to declare the associated auxiliary boiler feed pump inoperable whenever 32 or 33 Static Inverter is placed on maintenance bypass.

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2) Training during Operator requalification cycle and as part of the Engineering Support Personnel (ESP) training program will advise personnel that the review of temporary or permanent modifications requires assessment of the impact on administrative requirements affecting systems and component operability. This is scheduled to be completed by the end of the training cycle, July 30, 1998.

Corrective Actions to be Taken to Avoid Further Violations

The requirement to declare the associated auxiliary boiler feed pump inoperable whenever 32 or 33 Static Inverter is placed on maintenance bypass will be incorporated in the appropriate operating procedures. This is scheduled to be completed by February 27, 1998.

Date When Full Compliance Will Be Achieved

Compliance was achieved on December 12, 1997, when the Shift Order was issued.

Example number 2

NYPA agrees that the corrective actions were not adequate to preclude repetition for the inadvertent contamination of the main boiler feed pump control oil system.

Reason for Violation

The reason for this example is inadequate work practices, failure to identify effective temporary measures which may have precluded the LoveJoy control system speed changer cup (Badger) valves from hanging up and malfunctioning. The corrective actions taken did not preclude system contamination from adversely affecting operation of the Main Boiler Feed Pump (MBFP) control oil system.

The LoveJoy hydraulic control system for the MBFPs has experienced other events involving contaminated oil and debris. Particulate contamination or momentary blockage of hydraulic passages or orifices in the MBFP Turbine Control Valves can cause control pressure swings that will affect turbine speed and subsequent low flows. The cause of the debris is attributed to degradation in the lines from moisture and oxygen entrained in the oil. Previous corrective actions involved inspections, overhaul and cleaning of the stop and control valves, oil flushing to remove any remaining particulate, and a proposed modification for changing the oil system filters from 25 micron to 3-6 micron. The mesh size for the high pressure filters in the control oil path was reduced from 149 microns to 25 microns until the proposed modification can be installed.

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Contamination of the control oil system was considered as the cause of a perturbation to the 31 MBFP during transfer of control oil flow paths (from "A" to "B"). The amount of contamination, in the two inch (approximately 3 feet long) pump suction line, which may have been moved to the oil reservoir when the recirculation pump was started, could not be confirmed to have caused the LoveJoy control system Badger valves to hang up and malfunction.

Corrective Actions Taken or To Be Taken

1) On November 18, 1997, the MBFP reservoir return oil strainer basket was cleaned, the MBFP oil filters were swaped and cleaned. These requirements were included in the non-outage schedule to be performed once per month.

2) The system operating procedure was revised on November 26, 1997 to periodically clean the LoveJoy speed changer cup valves when the flow path is out of service to remove accumulated debris.

3) The system operating procedure was revised on January 23, 1998 with a caution concerning placing equipment in service that has been idled, and to sample the oil when making configuration changes to keep the contamination levels down.

4) A review of control oil systems found the Main Turbine Oil system susceptable to malfunction from contamination. The Main Turbine Oil system operating procedure will be revised to contain similar precautions to limit the extent of contamination problems. This is scheduled to be completed by March 2, 1998.

5) Further evaluation by Engineering will determine if a Loop Oil Conditioner system modification will be installed to enhance the existing filtration in the MBFP control oil system prior to RO10. This evaluation is scheduled to be completed by April 3, 1998.

6) The filtration for the MBFP control oil system will be enhanced to reduce the contamination particle size which may cause the LoveJoy control system Badger valves to hang up and malfunction. This is scheduled to be completed prior to heat up from R010.

Corrective Actions to be Taken to Avoid Further Violations

Training during Operator requalification cycle and as part of Engineering departmental training will advise personnel of the importance of interim corrective actions to prevent adversely affecting operation of systems and components. This is scheduled to be completed by the end of the training cycle, July 30, 1998.

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Date When Full Compliance Will Be Achieved

Compliance was achieved on January 23, 1998, when the system operating procedure was revised.

Example number 3

NYPA disagrees with this example because a condition adverse to quality did not exist, although prompt action was not taken to resolve an apparent procedural discrepancy for the limits of the weld channel system.

Reason for Disagreeing with Example

An identified apparent discrepancy between procedures was not promptly corrected. The alarm response procedure (ARP-14), "Panel SLF - Weld Channel," indicated a limit of 14.2 scfm, which corresponds to a calculated value of the weld channel leakage rate that, if sustained for 24 hours, would equal the 0.2 percent of the containment volume per day limit as described in Technical Specification (TS) 3.3.D.1.b. The off normal operating procedure (ONOP-CB-2), "Loss of WCCPPS or Isolation Valve Seal Water System," specified a limit of 10.0 scfm. The lower threshhold limit of 10 scfm is an administrative limit for entering a limiting condition for operation to preclude exceeding the TS limit. Therefore, neither of these limits were incorrect. However, management's expectation is to have apparent conflicts, such as this, identified to the procedure owner and resolved.

Corrective Actions Taken or To Be Taken

1) Operations revised ARP-14 on December 24, 1997 to note that 10 scfm is the operational limit for entering an LCO. On February 6, 1998 procedure ONOP-CB-2 and SOP-CB-4, "Weld Channel and Containment Penetration Pressurization System Operation," were also revised.

2) Lessons learned from this event were distributed on February 2, 1998 to operators and operations staff as required reading.

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Violation 97-10-03

"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 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)."

Response to Violation 97-10-03

NYPA agrees with this violation in that personnel failed to follow station procedure SPO-SD-01, "Work Control Process," by not entering several problem identification descriptions (PIDs).

Reason for Violation

The cause of this violation was personnel error, failure to adhere to established procedures. The person who intiated the PID tag to request the relocation of the spent fuel pool high level alarm floats failed to follow station directive SPO-SD-01, "Work Control Process," by not entering the PID in the Reliable On-line Maintenance Environment (ROME) computer database. The reason why the originator did not enter the PID could not be determined because a new PID was written and entered in the system, and the old PID was inadvertently discarded.

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Station directive SPO-SD-01 was also not followed when PIDs prepared for cold weather preparation issues were not hung and entered in the ROME database. During operational checks of plant unit heaters, eight PID tags were written. These PIDS were not considered high priority issues nor an operational concern. The individual failed to process the PIDs, primarily due to poor prioritization of his work activities.

Corrective Actions Taken

1) Walkdowns conducted identified other instances where PIDs were not entered in the ROME database and hard copy tags were not submitted to Work Control. These were determined to not be related with Technical Specification or Operational Specification systems and components.

2) Supervisor counseled personnel for failure to follow station directive SPO-SD-01.

3) On December 11, 1997, the Tailgate agenda by Work Control reminded personnel that a written PID tag, hung on equipment in the field, must be submitted for review to the Watch or to Work Control and entered in the ROME system.

Corrective Actions to be Taken to Avoid Further Violations

Enhancements to procedure SPO-SD-01 will be made to clarify the prompt hanging of a PID in the field and for prompt submittal of PID information for review. This is scheduled for completion by April 1, 1998.

Date When Full Compliance Will Be Achieved

Compliance was achieved on December 10, 1997 when the PID for the spent fuel pool float and the eight PIDs for the unit heaters were entered in the Rome database. Since that time, other problems with use of PIDs were identified by plant staff in Deviation Event Reports. These additional PID events will be addressed in accordance with the Corrective Actions Program.

List of Commitments

Number	Commitment	Due
IPN-98-014-01	The requirement to declare the associated auxiliary boiler feed pump inoperable whenever 32 or 33 Static Inverter is placed on maintenance bypass will be incorporated in the appropriate operating procedures.	February 27, 1998
IPN-98-014-02	Revise the Main Turbine Oil system operating procedure to caution placing equipment in service that has been idled, and to sample the oil when making configuration changes to keep the contamination levels down.	March 2, 1998
IPN-98-014-03	The filtration for the MBFP control oil system will be enhanced to reduce the contamination particle size which may caused the LoveJoy control system Badger valves to hang up and malfunction.	Prior to heat up from R010.