

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

July 23 , 1998  
IPN-98-083

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 50-286/98002-01**

Dear Sir:

This letter provides, in Attachment I, the New York Power Authority's response to the Notice of Violation contained in NRC Integrated Inspection Report 50-286/98-02.

The Authority is making no new commitments in this letter. If you have any questions, please contact Mr. Ken Peters at (914) 736-8029.

Very truly yours,

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

Attachment  
cc: See next page

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PDR ADOCK 05000286  
G PDR

Docket No. 50-286

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

Resident Inspectors' Office  
Indian Point 3 Nuclear Power Plant  
U.S. Nuclear Regulatory Commission  
P.O. Box 337  
Buchanan, N.Y. 10511

**Reply to Notice of Violation 50-286/98002-01**

Violation (VIO 98002-01)

"Indian Point 3 Technical Specification 6.8.2 requires, in part, that written procedures, including the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972, be approved by appropriate responsible members of management prior to implementation.

Appendix "A" of Regulatory Guide 1.33, "Quality Assurance Program Requirements," November 1972, recommends, in part, that instructions be prepared, as appropriate, for filling and venting the chemical and volume control system.

Contrary to the above, on April 10, 1998, written procedures for venting and filling portions of the chemical and volume control system were not approved by appropriate responsible members of management prior to implementation. The preparation of an approved procedure was appropriate for this specific activity, because the activity was being performed with the system in an abnormal configuration and had the potential to impact the operation of the system.

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

Response to Violation (VIO 50-286/98002-01)

The New York Power Authority agrees with this violation.

Reason for Violation (VIO 50-286/98002-01)

The cause of this violation was personnel error. Management expectations for Operations manipulation of equipment were not met because written instructions were not prepared for returning the system to service following maintenance.

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained for the activities identified. Those activities include applicable procedures recommended in Appendix A of Safety Guide 33 (Regulatory Guide 1.33), November 1972. Technical Specification 6.8.2 provides approval guidance.

Administrative Procedure AP-10.1, "Protective Tagging" for equipment is a procedure used to meet the Safety Guide 33, Appendix A requirement for administrative procedures for equipment control. AP-10.1 was approved in accordance with

Technical Specification 6.8.2. The return to service of the chemical and volume control system header was planned in accordance with AP-10.1. When planning the return to service, documented instruction should have been provided. AP-10.1 requires devices to be positioned in sequential order specified in the PTO. Therefore, the protective tagout should establish the proper sequence for isolating, draining, and venting components and systems.

Corrective Actions Taken

A shift order was issued to clarify management expectations regarding adherence to AP-10.1 with regard to filling and venting. The Authority has also initiated action under the corrective action program to revise AP-10.1 to enhance guidance on management expectations for operator actions during filling and venting.

Date when Full Compliance was Achieved

Compliance was achieved on July 17, 1998, when the shift order was issued to ensure operations personnel would understand Management's expectation.