POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT NO. 3 NUCLEAR POWER PLANT
P. O. BOX 215 BUCHANAN, N. Y. 10511
TELEPHONE: 914-739-8200

April 7, 1980
IP-WDH-8330

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

Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: Response to Inspection Report 79-23

Dear Mr. Brunner:

This letter is provided to you in response to your letter concerning Inspection 79-23 in a letter to me dated March 14, 1980, and received at our office March 17, 1980.

A portion of this inspection discusses 10 CFR 2.790 information. The response to this section is contained in Appendix A to this letter. Appendix B contains our response to the remainder of the inspection report.

We feel that the corrective actions taken adequately address the concerns expressed by the inspector and will prevent similar occurrences in the future. If you have any further questions concerning this matter, please do not hesitate to contact me.

Very truly yours,

J. P. Bayne
Resident Manager

WDH/bam

Enclosures:
1. Appendix A, Response to Appendix A of subject Inspection Report. (Contains 2.790 (d) information).
2. Appendix B, Response to Appendix B of subject Inspection Report.

cc: Resident Inspector T. Rebelowski

Appendix B

The following item was identified as an infraction.

Technical Specification (TS) 6.8.1.b requires that written procedures shall be established, implemented and maintained covering the activities during Refueling Operations.

Refueling Procedure SOP-RP-21, Filling the Refueling Cavity, Paragraph 8.9, requires licensee to vent out all air until the spray header is full.

Contrary to the above, on October 1, 1979, at approximately 1555 hours, the licensee proceeded to start the containment spray pump prior to venting the spray header. The failure to comply with Refueling Procedure SOP-RP-21, Paragraph 8.9, was a factor in the inadvertent pressurization of containment spray header.

RESPONSE

The procedure, SOP-RP-21 Rev. 1, required the operator to vent out all air until the spray header was full. Prior to this incident a valve lineup was properly completed to fill the refueling cavity using one of the containment spray pumps and header, but was inadvertently performed on the adjacent line due to inadequate identification of the two fill lines. During the venting operation of the fill line additional time should have been allocated to determine that the proper fill line had been selected. As a result the procedure was changed immediately to gravity fill the refueling cavity to a level of two feet and the lines were properly identified. Because of the higher elevation of the containment spray ring header, no water will spill out if the incorrect header is chosen. The pump is then allowed to be started to complete the filling of the cavity.

It was stated in the Inspection Report that the pump was ordered to be started by the Shift Supervisor without verification of lineup by the control room personnel. The Shift Supervisor had the valve lineup properly completed and verified by the field operator but on the wrong line because of the inadequate identification. The control room operator is not required to verify the lineup from the control room since it is performed by the field operator. However it is recognized that the control room operator should have the procedure out during this evolution.

The licensed operations personnel have been instructed to ensure that the required procedures are at hand and in use when performing infrequent or involved operations.

The following item was identified as a deficiency.

Technical Specification 6.8.1.a requires that written procedures be established, implemented and maintained.

AP-27.3 (Fire Protection System), Paragraph 5, addresses Combustible Material Control and requires that mandatory checks be accomplished in vital areas. When hazards exist the Shift Supervisor is required to take the necessary action to have materials removed.

Contrary to the above, upon notification of the operations staff on October 19 and 24, 1979, no action was taken to reduce the identified combustibles, stored in vital areas, indicated below:

1. Six open barrels of residual lubricating oil and an accumulation of debris were stored in the Control Building - Elevation 15'-480V switchgear room.

2. Combustibles in the form of flammable oil soaked absorbent pads and a roll of pads were stored in the emergency diesel generator rooms.

RESPONSE

The barrels of diesel fuel oil were being drawn off from the sump in the bottom of the diesel generators to be used for fuel in portable heaters. However, this requires the drums of oil to be lifted over a four (4) foot dam to remove them from the control building. During this time the access path for the vehicle necessary to remove the drums was blocked. When this material was subsequently removed the drums were removed. The use of this oil for fueling the portable heaters in this manner has ceased.

The accumulated debris was scaffolding which was in the process of being erected for the purpose of installing the piping for the Fire Protection System.

The combustibles in the diesel generator rooms were generated during the collection of oil into the drums and has since been removed. This will no longer be required since the process of filling the drums has ceased.