

POWER AUTHORITY OF THE STATE OF NEW YORK  
INDIAN POINT NO. 3 NUCLEAR POWER PLANT

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TELEPHONE: 914-739-8200



October 5, 1978  
IP-JWK-3092

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

Boyce H. Grier, Director  
Office of Inspection and Enforcement  
Region 1, U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

In accordance with my telephone conversation with Dr. R. Bores of your staff on October 3, 1978, I am forwarding a detailed response to Inspection Report 50-286/78-13. This letter supercedes our letters of September 18, 1978 and September 21, 1978. Our delay in submitting this response resulted from the need to establish liaison with Consolidated Edison to permit the Authority review and evaluation of corrective actions for violations identified in inspection reports.

Item A.1

As of May 23, 1978, the Environmental Protection Committee (EPC) failed to respond to QSR, outlining proposed corrective actions to correct identified deficiencies relative to QSR Audit Report 77-A10, "Audit of Indian Point ETSR - Thermal Discharges", dated June 2, 1978, and transmitted to the EPC by letter dated June 23, 1977. While the Nuclear Power Generation Department received a draft of the above audit prior to June 28, 1977, and responded by letter to the EPC with a copy to QSR on January 6, 1978, the response exceeded the 30 day response requirement and did not outline the specific proposed corrective actions to be taken to correct audit identified deficiencies.

Con Edison's response to you on this item states, "The failure to respond in a timely manner resulted from the fact that the subject audit report had not been properly routed to responsible parties in an expeditious manner. Audits will be addressed directly to action addressees, as is the practice with QA audits performed on behalf of the NFSC. A copy of that audit report will be directed to the EPC for their review."

Con Edison has informed us that a new section 3.4.h. has been added to procedure QA 410, Audit Program for Nonradiological Environmental Technical Specification Requirements.

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"h. Correspondence concerning QA Audits and corrective action should also be provided to PASNY in a timely manner with invitations to attend meetings concerning the audits."

The Authority concurs that this corrective action should prevent recurrence of this item.

Item A.2

Since December 1975, the intake temperature probe of the Partlow system had been calibrated at six month intervals using a technique other than described by calibration procedure IPC-I-32, Rev. 1.

Con Edison's response to you on this item states, "The procedure for the calibration of the Partlow system intake temperature probe has been revised to include the alternate calibration technique. In order to prevent recurrence of this item, personnel responsible for the implementation of these procedures have been reinstructed in the need to obtain proper approval for procedural changes.

The Authority concurs that this corrective action should prevent recurrence of this item.

Item A.3

Detailed, written and approved procedures were not prepared for the dual temperature sensor system (Bendix System) calibration, nor for the required monthly temperature sensor system functional tests.

Con Edison's response to you on this item states, "Detailed written procedures for the calibration and functional testing of the Bendix circulating water temperature sensor system have been prepared and approved.

In order to prevent recurrence of this item, SAO 117, "Calibration and Control of Measuring and Test Equipment" has been revised to emphasize the requirement that detailed written procedures be prepared, approved and adhered to for the calibration and testing of instruments used in the performance of measurements and analyses which are stipulated by the Environmental Technical Specification Requirements."

The Authority concurs that this corrective action should prevent recurrence of this item.

Item B

An anomalous measurement report, relative to levels of I-131 in excess of ten times the control levels, in a March 27, 1978, Camp Field Reservoir sample, was not submitted to the NRC until June 9, 1978, an interval in excess of ten days after the measured level was confirmed by reanalysis in excess of 30 days after the medium was resampled on April 11.

Con Edison's response to you on this item stated, "This item resulted from a difference in interpretation of the reporting requirements for anomalous measurements. Following discussions with your inspector as to correct interpretation, personnel responsible for the reporting of anomalous measurements were instructed that the time for these reports is to be counted from receipt of oral verification of the analysis.

Con Edison has informed us that, "The reporting of results by our contractors has been modified by verbal instruction, and will be modified in writing, so as to provide notifications directly to the Resident Manager of Indian Point 3 Nuclear Power Plant of all information relating to the analysis of radioactive content of environmental samples, in the same manner that Con Edison personnel are now notified. Authority personnel will be asked for their concurrence in all technical evaluations before purchase orders are placed by Con Edison as an agent for the Authority when they relate to the analysis of radioactive content of environmental samples.

The Authority concurs that this corrective action should prevent recurrence of this item.

Item C

Temporary procedure changes, which were made in the fish biocharacteristics sampling program, including Texas Instruments, Inc., designated change numbers 78-1 and 78-3, and which were implemented by April 15, 1978, (a) were not approved by members of PASNY staff prior to implementation and (b) were not reviewed by PORC, nor approved by the Resident Manager as of May 23, 1978, an interval exceeding 30 days.

Con Edison's response to you on this item states, "The subject procedural changes were approved by the EPC at the June 16, 1978 meeting of the Committee. In order to prevent recurrence, the responsible individuals have been instructed to submit changes to procedures to the EPC in a timely manner to assure the review and approval of the changes by the Committee within 30 days after implementation. In addition, checklists used in conjunction with QSR 410 Audit Program will include a requirement to check that procedures have been reviewed and approved by the EPC within 30 days after implementation.

Con Edison has informed us that, "In the specific instance referred to in the NRC inspection report, some minor changes to the biological study standard operating procedures were not submitted to the EPC immediately because of the anticipated delivery of several additional revisions. The responsible individuals have been instructed to submit changes to procedures to the EPC in a timely manner.

Regarding transmittal of such procedural changes to PASNY, the revisions discussed in the NRC report were transmitted to the PASNY EPC member when they were filed with the Environmental Protection Committee. There have been four additional transmittals to PASNY regarding biological study procedures. Of the five submissions, we have been notified of PORC action on only one.

In response to this allegation the Authority would like to point out that PORC review of procedures submitted by Con Edison are documented in meeting minutes which were distributed to the Con Edison representative to PORC.

The Authority's technical specification's for review of procedures and temporary procedure changes are inconsistent with Con Edison's and, thus, are contributing to violations of this nature. We have informed Con Edison of review problems in order to obtain compliance with our requirements. As discussed with Dr. R. Bores, we are processing a proposed technical specification change to duplicate our procedure requirements with those of Con Edison technical specifications.

The need for review of procedures in accordance with the Authority's technical specifications has been discussed with Con Edison site and headquarters personnel recently on a number of occasions, and documented.

Con Edison has recently informed us that their representative to the Authority's PORC will coordinate transmittal of procedures for review. This corrective action should prevent recurrence of this item.

#### Item D

At the time of inspection, the intake temperature sensors for Units 1 and 2 were inoperable and the rate of change of delta Tc was not recorded for all flow conditions (continuously).

Con Edison's response to you on this item states, "Repairs to the instrumentation associated with the intake temperature sensors and the rate of change of delta Tc were completed on May 31, 1978.

In order to prevent recurrence of this item, responsible personnel have been reminded of the need to issue a Maintenance Work Request when instrument or equipment deficiencies are observed.

In addition, the improved testing of the Bendix circulating water temperature sensor system (see Responses to Items A.3 and E) will provide further assurance of continued system operability."

The Authority concurs that this corrective action should prevent recurrence of this item.

Item E

Contrary to this requirement, as of May 23, 1978, the calibrations of the temperature system sensor did not include the sensor systems and monthly functional tests of the sensor systems had not been performed since September 1977.

Con Edison's response to you on this item states, "The required calibration and functional testing of the Bendix circulating water temperature sensor system was completed on May 31, 1978.

In order to prevent recurrence of this item, the calibration and testing of this system has been placed on a schedule for periodic surveillance testing under the cognizance of the Test and Performance Engineer."

The Authority concurs that this corrective action should prevent recurrence of this item.

Item F

The correlation between the maximum temperature in the discharge canal and the maximum surface temperature of the thermal plume for specific hydraulic conditions and plant operating conditions had not been developed and/or reported in the 1976 Annual Environmental Operating Report.

In the 1977 Annual Environmental Operating Report the information used to establish the correlation was provided. Further information required will be provided in the subsequent Annual Environmental Operating Report. This corrective action should be adequate to resolve this item.

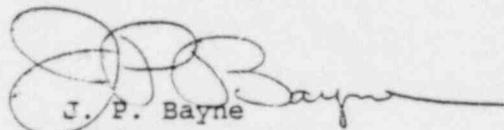
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Significant effort is being made to comply with technical specification procedure review requirements. Despite this effort, we feel that the proposed

technical specification changes to be submitted within 30 days is necessary to ensure full compliance with procedure review requirements.

In order to prevent recurrence of similar items, the Authority will perform periodic audits of Con Edison's activities related to the Environmental Technical Specification requirements.

Very truly yours,

  
J. P. Bayne  
Resident Manager

JWK/rbb

cc:

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