

U. S. NUCLEAR REGULATORY COMMISSION

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REGION I

Report No. 50-286/82-14

Docket No. 50-286

License No. DPR-64

Priority   --  

Category C

Licensee: Power Authority of the State of New York  
10 Columbus Circle  
New York, New York 10019

Facility Name: Indian Point Nuclear Generating Station, Unit 3

Inspection at: Buchanan, New York

Inspection Conducted: July 16, 1982 to August 15, 1982

Inspectors:

T. Foley 8/16/82  
T. Foley, Senior Resident Inspector date

T. J. Kenny 8/16/82  
T. J. Kenny, Resident Inspector date

H. Kister 8/20/82  
H. Kister, Chief, Indian Point Resident  
Section, Division of Project and  
Resident Programs date

Inspection Summary:

Inspections on July 16, 1982 to August 15, 1982 (Inspection Report 50-286/82-14)

Areas Inspected: Routine onsite regular and backshift inspections of plant operations including shift logs and records; plant tour; surveillance; maintenance; review of training and retraining; review of off-site review committee activities; review of transportation of radioactive waste; review of monthly report; licensee event reports, and followup on IE Circulars.

The inspection involved 125 inspector hours by the resident inspectors.

Results: Of the eight areas inspected, no violations were identified.

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## DETAILS

### 1. Persons Contacted

M. Albright, Instrument and Control Superintendent  
J. Brons, Resident Manager  
J. Davis, Director, Nuclear D&A  
J. Dube, Security and Safety Supervisor  
D. Halama, Q.A. Superintendent  
W. Hamlin, Assistant to the Resident Manager  
W. Josiger, Superintendent of Power  
A. Klausman, Vice President, Quality Assurance  
J. Perrotta, Radiological and Environmental Services Superintendent  
S. Munoz, Technical Services Supervisor  
E. Tagliamonti, Operations Superintendent  
J. Vignola, Maintenance Superintendent  
G. Wilverding, Manager - Nuclear Safety Evaluation

The inspector also interviewed and observed other licensee employees including members of the operations, health physics, technical services, maintenance, and security staffs.

### 2. Licensee Actions on Previous Inspection Findings

(Closed) Inspector Follow Item (50-286/79-18-02) Delinquent Reactor Operator Requalification Program. A review by the inspector indicates no problem areas exist with the exception listed in Section 6.C.2.

(Closed) Unresolved Item (50-286/79-21-03) Relocation of Contaminated Filter Beds. This item was examined in Report 80-11, and the item was turned over to NRR for resolution. The inspector, through discussions with the licensee's project manager from NRR, determined that this item has been resolved, as indicated, by a memo written within NRR from Novak to Higgenbottom, dated May 13, 1980, which discusses and closes the issue.

(Closed) Unresolved Item (50-286/80-03-01) Methods of Training and Documentation Reference Training Required by Confirmatory Order of February 11, 1980. The inspector has reviewed the licensee's Indoctrination & Training Manual, and records which address the concerns of the confirmatory order.

(Closed) Inspector Follow Item (50-286/81-12-05) I&C Technician Training in the Use of Equipment and Systems Used to Control or Mitigate Accidents. The inspector reviewed the training documents for I&C technicians and has no further questions.

(Closed) Inspector Follow Item (50-286/81-13-03) No Record of Training for Two Individuals in the Health Physics Area. The inspector verified that the Health Physics training had been completed and the records were available.

### 3. Plant Tour

A. Normal and backshift inspections were conducted during routine entries into the protected area of the plant, including the control room, PAB, fuel building, and containment. During the inspection activities, discussions were held with operators, technicians (HP & I&C), mechanics, foremen, supervisors, and plant management. The purpose of the inspection was to affirm the licensee's commitments and compliance with 10 CFR, Technical Specifications, and Administrative Procedures. Particular attention was directed in the following areas:

- Instrumentation and recorder traces for abnormalities;
- Proper control room and shift manning;
- Proper use of procedures;
- Review of logs to obtain plant conditions;
- Verification of proper radiologically controlled areas and access points;
- Verification of surveillance testing for timely completion;
- Verification of safety related tagouts;
- Plant housekeeping and cleanliness;
- That protected area access controls were in conformance with the security plan, including sufficient guards to perform duties, and that selected gates and doors were closed and locked.
- Selected liquid and gaseous samples to verify conformance with regulatory requirements prior to release; and,
- Boric acid samples to confirm proper boric acid level for plant shutdown conditions.

B. During the inspection, the inspector reviewed the following procedures, documents, or evolutions:

- Radioactive Waste Release Permit (liquid & gaseous)
- Various shift turnover checklists
- Security Station Logs and Radio Checks
- Jumper Log
- Selected Operators' Logs
- Selected Tagouts
- Selected Radiation Exposure Authorizations (REA's)

C. Findings:

The inspector witnessed the hydrostatic testing of the newly installed, differently designed, #32 Fan Cooler Unit. The test was conducted by properly trained and informed personnel. The test satisfied the criteria delineated in the procedure.

The inspector also reviewed Procedure 3PT-ENG-78, "Containment Recirculation, Fan Cooler High Pressure Hydrostatic Test" noting that the instrumentation used had been calibrated within the proper period.

No violations were identified.

4. Surveillance

The inspector either directly observed the performance of or reviewed completed surveillance procedures to ascertain the following:

- That the instrumentation used was properly calibrated;
- That the redundant system or component was operable where required;
- That properly approved procedures were used by qualified personnel;
- That the acceptance criteria were met;
- That the test data were accurate and complete;
- That proper reviews, by the licensee, had been conducted;
- That the results of the tests met Technical Specification requirements; and,
- That the testing was done within the required surveillance schedule.

The inspector reviewed the following tests:

- 3PT-R16 Diesel Generator Functional Test for #32 Emergency Diesel Generator
- 3PT-M18 Residual Heat Removal Pump Functional Test
- 3PT-M20 Auxiliary Boiler Feed Pump Functional Test
- 3PT-M21 Station Batteries Surveillance
- 3PT-M42 Main Fire Pump Operability Test
- 3PT-M49 Fire Pump Diesel Battery Surveillance

No violations were identified.

## 5. Maintenance

The inspector selected completed maintenance activities listed below to ascertain the following:

- The activities did not violate a limiting condition for operation;
- That redundant components were operable;
- That equipment was tagged out in accordance with licensee approved procedures;
- That approved procedures, adequate to control the activity, were being used by qualified technicians;
- That Q/C hold points were observed, and that materials were properly certified;
- That radiological controls were proper and in accordance with licensee approved radiation exposure authorizations; and,
- That the equipment was properly tested prior to return to service.

- (1) Replacement of a broken test connection PC-1321-S and #3 of the Weld Channel and Containment Penetration Pressurization System

Documents reviewed:

- Work Requests 2910 and 2911
- Weld requisition for weld rod #14499
- Work step list
- Procedure and sketches used to perform work
- Certification of materials

- (2) Repair of Valve 863 of the Nitrogen System

Documents reviewed:

- Work Request 2812
- Work step list
- Certification of materials

No violations were identified.

## 6. Review of Training and Retraining

### A. Documents reviewed:

- ANSI 18.1      -Selection and Training of Nuclear Power Plant Personnel
- ANSI 3.1      -Selection and Training of Nuclear Power Plant Personnel
- 10 CFR 55 and Appendix A      -Operators License
- Technical Specifications
- NUREG 0737
- FSAR Chapter 12-Conduct of Operations
- AP-15            -Training Procedures
- ITP 15           -Indoctrination and Training Manual

### B. The inspector conducted an indepth review of the licensee's training and retraining programs to ascertain that:

1. Craftsmen, technicians, and new employees are receiving the required training as required by the above-listed documents;
2. Changes to the training and retraining program have been incorporated into the licensee's training manuals;
3. Training records are being maintained;
4. Schedules are being utilized;
5. Lectures are being conducted from prepared lesson plans; and
6. Licensed personnel are receiving the required retraining, as required by the above listed documents.

### C. The inspector had the following findings:

1. Procedures for conducting the retraining of I&C personnel in the indication of core damage as required by NUREG 0737 are in place, but have not been incorporated into the licensee's training manual. After discussion with the licensee, the licensee has stated that the training procedures will be implemented into the training manual.

2. The condition of the license (for operators) as stated in 10 CFR 55.31.e states that to fulfill the license, the functions of an operator or senior operator must be fulfilled at least every four months. The inspector identified to the licensee that several offsite licenses were receiving training on a simulator on a six-month basis. The licensee contended that this is true, and that in order to utilize these licenses, the conditions stated in 10 CFR 55.31.e (demonstrate to the Commission that his knowledge and understanding of the facility's operation is satisfactory) would have to be satisfied. The licensee also stated that a new program for onsite personnel with licenses, not actively involved in the day to day operation, would receive a period of hands-on experience on a quarterly basis. The inspector will follow this item. (50-286/82-14-01)

The inspector also verified that Item II.K.1.3 of NUREG 0737, the review of Bulletins 79-06, 79-06A and 79-06A, Rev. 1, have been reviewed by the licensee.

No violations were identified.

7. Review of Offsite Review Committee (SRC) Activities

A. Documents reviewed:

- Technical Specifications, Section Six
- ANSI N-18.7
- 10 CFR 50
- Members' Resumes
- Committee minutes for 1982
- Safety Review Committee Procedural Manual

B. The inspector reviewed the activities of the offsite review committee to ascertain the following:

- That the membership had the proper qualifications for the speciality in which they served;
- That meetings were convened in the time frame required;
- That the committee reviewed:
  1. Safety evaluations;
  2. 24-hour notifications;
  3. Violations;
  4. Onsite review group minutes;

5. Changes to Technical Specifications; and,

6. 10 CFR 50.59 reviews; and,

- That the committee performed audits in accordance with their charter.

C. The inspector had the following finding:

- Technical Specification 6.5.2.7.9 requires 24-hour written notifications to the Commission be reviewed by the SRC. PASNY's SRC Procedural Manual, Section 3.1, part 5.1.1.g requires independent reviews be conducted on events requiring 24-hour written notification to the Commission. At the time of the review, August 4, 1982, the inspector identified, to the licensee, that several 24-hour notifications had not been reviewed by the committee. However, no time constraint is addressed in either the Technical Specifications, nor in the SRC Procedural Manual, although it is implied they should be conducted at least as timely as the meeting frequency (every 6 months), required by Technical Specifications. Following discussion with the licensee, the licensee has scheduled a meeting in the near future to review the 24-hour events. This issue is unresolved, pending confirmation of the licensee's commitment to delineate the frequency of reviews for 24-hour notification events. (50-286/82-14-02)

No violations were identified.

## 8. Review of Transportation of Radioactive Waste

### A. Transportation of Radioactive Material

The inspector verified by record review, direct observation, and discussion with licensee representatives that implementation of licensee procedures for loading low specific activity (LSA) radioactive waste on a tractor-trailer in preparation for material shipment number 82-15 was acceptable.

Shipment 82-15 of LSA to Barnwall, S.C., consisted of (73) Type 17H waste drums (547 cubic feet) containing a total of .246 curies of activity; group transport Type III and IV. The inspector reviewed the following documents associated with this shipment:

- Radiological Survey Sheet of LSA Drums;
- Radiological Survey Sheet of Waste Drum Truck and Trailer #321;
- Radiological Waste Shipment Prior Notification and Manifest;
- South Carolina Department of Health and Environmental Control Radioactive Waste Shipment Certification Form for Shipment No. 0782-340-L;



- Transportation Permit No. 0072-31-82-X; and
- Radioactive Record Shipment Form for Shipment 82-15.

The inspector observed the controls associated with the contamination levels and radiation levels of the shipment. The inspector verified by independent measurements that the LSA shipment complied with Department of Transportation (DOT) requirements for maximum permitted radiation levels on contact, and at six feet from the trailer. The inspector verified by direct observation that the required standardized vehicle placards were installed on the exterior of the shipment per 49 CFR 172.556.

No inadequacies were identified associated with the above shipment.

#### B. Program Review

The inspector reviewed the licensee's Radioactive Waste Transportation Program to determine whether written procedures were established, and a training program was implemented for: packaging, marking/labeling, monitoring, loading, placarding, and notifications. The inspector also determined that Quality Assurance audits are being conducted in the radwaste shipment area.

The inspector reviewed the following documents in relation to the program review:

- HPI-9.20 Radioactive Waste Handling and Packaging;
- HPI-9.11 Radioactive Material Handling and Shipment;
- HPI-9.14 Identification and Control of Radioactive Materials;
- IE Bulletin Packaging of Low Level Radioactive Waste for  
79-19 Transport and Burial;
- Code of Federal Regulations, Title 10, Parts 10 and 71; and,
- Code of Federal Regulations, Title 49.

The inspector reviewed lesson plans which satisfy the concerns addressed in IE Bulletin 79-19; training records, tests and attendance sheets were also observed. The licensee's training program in the radwaste transportation area has been implemented; however, records and formal documentation of the training is currently difficult to retrieve due to the current reorganization of the training department. The training department is transferring the responsibility of radwaste transportation to one specific training instructor with expertise in that area.

The inspector reviewed quality assurance audits 81-03, 81-19, and 81-38 of radwaste transportation activities. All discrepancies noted were corrected in a timely manner.

No violations were identified.

## 9. Review of Monthly Report

### A. Monthly Operating Report

The Monthly Operating Report for June, 1982 was reviewed. The review included an examination of selected maintenance work requests, and an examination of significant occurrence reports to ascertain that the summary of operating experience was properly documented.

### B. Findings:

The inspector verified through record reviews and observations of maintenance in progress that:

- The corrective action was adequate for resolution of the identified items; and,
- The Operating Report included the requirements of TS 6.9.1.6.

The inspector has no further questions relating to the report.

## 10. Licensee Event Reports

### A. In Office Review of Licensee Event Reports

The inspector reviewed LER's submitted to the NRC:RI office to verify that details of the event were clearly reported, including the accuracy of the description of cause and adequacy of corrective action. The inspector determined whether further information was required from the licensee, whether generic implications were involved, and whether the event warranted onsite followup. The following LER's were reviewed:

<u>Report Number</u>	<u>Subject</u>
82-003/01T-0	Calibration of pressure transmitters for the pressurizer
82-004/01T-0	Setpoints of pressurizer safety valves, non-conservative

## B. Onsite Licensee Event Followup

The LER's listed below were reviewed to verify that the reporting requirements of Technical Specifications and Station Administrative Procedures had been met, that appropriate corrective action had been taken, that the event was reviewed by the PORC (Plant Operating Review Committee), and that continued operation of the facility was in conformance with the Technical Specification limits.

### 1) 82-003/01T-0

The inspector reviewed previous similar events, 80-015/03L-0 and 78-021/03L-0 which indicated that the transmitters 456 and 457 had non-conservative high setpoints. This LER was written because of non-conservative low setpoints due to the licensee's practice of setting the transmitter on the low side of the allowable setpoint. The licensee plans to replace the transmitters with a new environmentally qualified one in the near future. The inspector reviewed purchase order 81-IP-4121, which purchases such transmitters.

### 2) 82-004/01T-0

The inspector reviewed vendor test data and confirmed the lower setpoints. The vendor, on the request of the licensee, then tested the valves in a condition simulating actual temperature conditions within the containment. These setpoints were lower, as indicated, in the LER. After discussion, the licensee's plans to correct the problem will be to set the valves in an actual temperature condition, and on the maximum allowable high setpoint, to compensate for the drift which has consistently been in the low direction. All of the pressurizer safety valves have been reset to the proper setpoints at this time.

No violations were identified.

## 11. Followup on IE Circulars

The inspector reviewed the following IE Circulars. For each circular reviewed, the inspector ascertained that:

- The circular was received by the licensee's management;
- The circular was reviewed for applicability;
- For each circular, if it is applicable to the facility, the appropriate corrective actions have been taken or are scheduled to be taken; and,

- (Closed) 80-CI-22 Confirmation of Employee Qualifications. By review of PORC minutes, and a letter to file from the Personnel Manager, the licensee plans to invoke procedures, that require background investigations be conducted on each employee offered employment in accordance with the circular.

No violations were identified.

12. Unresolved Items

An item about which more information is required to determine whether it is acceptable or a violation is considered unresolved. Paragraph 7.c of this report contains an unresolved item.

13. Exit Interview

At periodic intervals during the course of the inspection, meetings were held with senior facility management to discuss the inspection scope and findings. An additional exit interview was held on August 17, 1982 to summarize inspection findings, and to discuss plant status and current inspector concerns.