

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

January 20, 1992
IP3-NRC-92-007

Joseph E. Russell
Resident Manager

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

Mr. Curtis J. Cowgill, Chief
Reactor Projects Branch No. 1
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection Report No. 50-286/91-22 and Associated
Notice of Violation (91-22-01)

Dear Mr Cowgill:

Attachment I to this letter provides the Authority's response to the Notice of Violation (91-22-01) enclosed with Inspection Report No. 50-286/91-22.

Should you or your staff have any questions concerning this matter, please contact Mr. M. Peckham at 914-736-8041.

Sincerely,

Joseph E. Russell
Resident Manager
Indian Point 3
Nuclear Power Plant

jer/ws/rj

Attachment

cc: Document Control Desk (Original)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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ATTACHMENT I

RESPONSE TO VIOLATION

91-22-01

VIOLATION

- A. Indian Point Unit 3 technical specification, Appendix B, section 2.2.b requires that the condenser air ejector and administration building vent radioactive gaseous effluent monitors, R-15 and R-46 respectively, be operable or that grab samples be taken at least once per twelve hours.

Contrary to the above, the Indian Point 3 Chemistry Department identified that the required backup grab samples were not taken within the required periodicity for R-15 on June 7, June 13 and July 11, 1991. Additionally, NRC identified another missed backup grab sample for R-15 on October 18, 1991 and missed backup grab samples for R-46 on July 11, 13, 18, and 24, 1991.

- B. Indian Point Unit 3 technical specification, Appendix A, section 3.5.3, table 3.5.4, note 3, requires the main steam line radiation monitors, R-62 (A-D), be operable or a pre-planned alternate sampling/monitoring capability be initiated no later than 72 hours after identification of the failure. If the monitor is not restored to an operable condition within 7 days, then a special report must be submitted to NRC within 14 days following the event.

Contrary to the above, the Indian Point 3 Chemistry Department identified that R-62-A had been out of service from January 6 to March 5, 1991 without the submittal of a special report to NRC. Additionally, NRC noted that the Chemistry Department had never initiated an alternate sampling/monitoring capability for any out-of-service main steam radiation monitor.

- C. Indian Point Unit 3 technical specification, Appendix B, section 2.1.c, table 2.2.1, note 2b requires that the steam generator blowdown effluent line radiation monitor, R-19 be operable or that grab samples be taken at least once per 24 hours.

Contrary to the above, the Indian Point 3 Chemistry Department identified that the required backup grab sample was not taken within the required periodicity for R-19 on March 19, 1991.

Collectively, this is a Severity Level IV Violation (Supplement 1).

RESPONSE

The Authority has reviewed the Notice of Violation outlined in Appendix A of NRC Inspection Report 91-22 and agrees that the Violation occurred as described. The Authority is presently in compliance and implementing programs to avoid further violations.

The reason for the violation was an inadequate root cause analysis that focused on a symptom of the problem not the cause. The flaw was the assumption that the Chemistry Department held the responsibility for the initiation and tracking of backup samples. The previous corrective actions were unsuccessful because they simply enhanced the program that was in effect. Further analysis was assigned to our independent review group, the Operational Experience Review Group, who correctly identified this error in logic. It is understood that the licensed operator has the responsibility for the safe operation of the facility in full compliance with all applicable laws, design and license conditions. Our delegation of the backup sample (compensatory actions) responsibility to Chemistry was misguided. Responsibility and accountability for all compensatory actions, including the initiation, tracking, and confirmation of backup samples has been formally assigned to the licensed operators on duty.

The Authority has reviewed the details of the examples in Appendix A and provides the following corrective actions:

Strengthen management's controls to prevent the recurrence of missed grab samples (Parts A and C of the Violation, a cognitive error by unlicensed employees) by the following:

- 1) On October 30, 1991 the Operations Department implemented a night order to have the control room senior operators carry Technical Specification requirements for out-of-service radiation monitors in their watch turnover sheets. This night order also directs the oncoming senior operator to contact the shift chemist to verify that a required sample was taken on the last shift, and, if the sample was not taken, to direct the shift chemist to immediately do the required sampling.
- 2) The Operations Department has implemented a procedure to establish a limiting condition for operation (LCO) log. The purpose of the log will be to track all LCOs requiring compensatory action that are in effect. The shift supervisor or senior reactor operator will verify at the start of each shift that the action is being performed.

- 3) On November 14, 1991 the Chemistry Department implemented a procedure change to procedure RE-CS-21, revision 7, "Radiation Sampling Schedule for Inplant and Effluent Monitoring", to ensure that sampling required for out-of-service radiation monitors is consistently done within the first four hours of the shift.
- 4) The Chemistry technicians have been advised of the significance of taking samples associated with limiting conditions for operation action statements.

Actions to prevent the recurrence of missed special reports (Part B of the Violation, a cognitive error by licensed personnel) are:

- 1) To assist in the determination of requirements associated with radiation monitors, Operator Aid #60, "Radiation Monitoring Time Requirements", has been incorporated as a reference into the Operations's LCO log procedure.
- 2) Licensing/OERG will provide an independent review of all plant occurrences for reportability.
- 3) A review of the technical specifications associated with radiation monitors will be included in the licensed operator requalification training program. All operators will be retrained by April 30, 1992.

A re-evaluation of the sampling requirements, for an R-62 detector being out of service, was performed. The Authority's position is consistent with the actions historically taken. Sampling will be initiated upon indication of a steam generator tube leak being detected by the condenser air ejector or steam generator blowdown radiation monitors. These backup monitors, other plant parameter instruments, and sampling capability provide operators the ability to monitor plant conditions during and following an accident.

The Authority also recognizes that the out-of-service time and reliability of radiation monitors contributed to the overreliance on backup sampling (compensatory actions). The following corrective actions are being implemented to address this concern:

- A) To improve reliability, the Authority will continue with plans to upgrade eight process radiation monitors during the next refueling outage scheduled for March, 1992.
- B) Administrative Procedure AP-9, "Work Control", has been revised to ensure that all technical specification radiation monitors are assigned a priority that requires repairs to proceed continuously during normal work hours.

- C) A new electronic work request system, ROME (Reliable On-line Maintenance Environment), and the newly established Work Control group, will enhance coordination and status tracking of work requests.

Licensing/Operational Experience Review Group will provide review of the effectiveness of the corrective actions at the end of a six month period.