

Indian Point 3
Nuclear Power Plant
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November 8, 1984
IP-WDH-3705

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

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUBJECT: Inspection No. 50-286/84-19

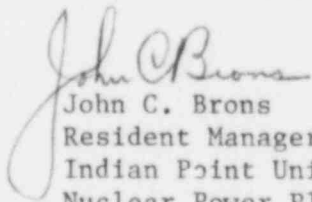
Dear Mr. Martin:

This letter provides the Authority's response to your Inspection Report No. 50-286/84-19 dated October 9, 1984 and received at this office on October 15, 1984.

Attachment I to this letter addresses the concerns cited in Appendix A (Notice of Violation) of the Inspection Report.

Should you or your staff have any questions concerning this matter, please contact Mr. W. Hamlin of my staff.

Very truly yours,


John C. Brons
Resident Manager
Indian Point Unit 3
Nuclear Power Plant

WDH:jmd

Attachment

cc: IP3 Resident Inspector's Office

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ATTACHMENT I

VIOLATION

A. 10 CFR 71.101(b) requires each licensee to establish a quality assurance program for packages. 10 CFR 71.101(f) states that a Commission approved quality assurance program that satisfies the applicable criteria of Appendix B of Part 50 of this chapter, and which is established, maintained, and executed with regard to transport packages will be accepted as satisfying the requirements of paragraph (b) of this section.

1. Criterion XVII, Appendix B, Part 50, "Quality Assurance Records", of the licensee's previously approved program, requires that the licensee maintain sufficient records to furnish evidence of activities affecting quality.

Contrary to the above, in December 1983, certain preventative maintenance activities were performed on the NUPAC 14D-2.0 transport package and the licensee did not maintain sufficient records to furnish evidence of activities affecting quality. Records were not maintained for the change of the secondary gasket and lubricant requirements.

2. Criterion XVIII, Appendix B, Part 5D, "Audits", of the licensee's previously approved program, requires that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the Quality Assurance Program for transport packages and to determine the effectiveness of the program.

Contrary to the above, a comprehensive system of planned and periodic audits has not been carried out to verify compliance with all aspects of the Quality Assurance Program for transport packages or to determine the effectiveness of the program.

RESPONSE

Item A. 1

The secondary gasket had been replaced and the various package lubricant requirements had been performed. However, subsequent to these activities, the preventative maintenance check list was apparently lost.

Those activities required by the lost check list were repeated on September 4, 1984.

We are adding to the inspection check list those activities covered in the preventative maintenance check list so that completion of these activities will be documented in two places. In addition, a copy of all preventative maintenance and other maintenance activities relating to the NUPAC 14D-2.0 transport package will be forwarded to the site Quality Assurance Superintendent.

These corrective actions have been completed.

Item A.2

The Authority's QA and Reliability Department has been implementing appropriate 10 CFR 50 Appendix B program elements to transport packages as provided for by 10 CFR 71.101 (f), previously approved programs. Such implementation is effected through a variety of activities which include document reviews, QC inspections, QA surveillances, QA audits and QA & R program appraisals. Records of these activities are documented on the forms and reports which apply to the type of activity performed.

While the Authority believes that the current standard audit program and the supplementary surveillance audits adequately cover the NRC concerns, the Authority will, by December 31, 1984, review its present procedures and develop a plan which defines site QA audit activities applicable to transport packages.