

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

P. O. BOX 215 BUCHANAN, N. Y. 10511

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September 18, 1978  
IP-JWK-2784

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:

Our letter of August 4, 1978, in response to violation of the Environmental Technical Specifications identified in Inspection Report 50-286/78-13 stated the Authority had requested notification of corrective action from Consolidated Edison.

Our requests, followed by Consolidated Edison's corrective actions, are listed below for your review:

A. Request

All Quality Assurance (QA) Audits of ETS requirements should be sent directly to the Authority concurrent with notification of the Con Edison Department being audited. All correspondence concerning the QA Audit should also be provided to the Authority in a timely manner with an invitation to all meetings concerning the audit and correction actions.

Corrective Action

A new section 3.4.h. has been added to procedure QA 410, "Audit Program for Nonradiological Environmental Technical Specification Requirements."

"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."

B. Request

There is now no formal mechanism to directly notify the Authority of the results of analyses of the radioactive content

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of environmental samples and as a result the Authority was never notified of the anomalous measurements that were not reported to the NRC. It is requested that the purchase orders with your contractors be modified so as to provide notifications directly to the Resident Manager of Indian Point 3 Nuclear Power Plant of all information relating to the ETS in the same manner that Con Edison personnel are notified. Authority personnel should also be made party to all purchase orders being placed by Con Edison as an agent for the Authority when they relate to the ETS. Incorporation of these actions will give Authority personnel equal access to information required to be reported to the NRC as Con Edison personnel now enjoy.

#### Corrective Action

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.

#### C. Request

Memorandum of Understanding (MOU) exist stating that Con Edison and the Authority will formally transmit procedures and procedure changes relating to the ETS to each other for review in a timely manner. This was not done by Con Edison in this case and resulted in an item of non-compliance for the Authority.

#### Corrective Action

In the specific instance referred to the 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.

D. and E. Request

Both items address one area, i.e., the monitoring of Indian Point thermal effluents. In addition to calibration and instrument functional check problems, the inspector noted that existing instrumentation does not comply with the minimum requirements of the ETS for sensitivity and accuracy. Con Edison personnel assigned to correct this situation should coordinate their actions with the Resident Manager, Indian Point 3 Nuclear Power Plant, and the Authority's Director or Environmental Services. There was a requirement in the ETS for the sensitivity of the entire system. The ETS specifies the sensitivity only for the temperature sensors, not for the entire system for measuring delta T's across the circulating water system. This limitation was intentional when the ETS was drafted. There is no biological necessity for a high degree of accuracy in measurements of delta T's. The sensitivity of the temperature sensors was specified simply because equipment with the level of sensitivity was readily available. This entire matter was discussed at an Environmental Protection Committee Meeting at which PASNY was represented. If any further action should be required, it will be coordinated with the individuals you have specified.

D. and E. Corrective Action

The finding of the inspector regarding minimum requirements of the ETS for sensitivity and accuracy concerned the temperature measuring sensors, which must have an accuracy of  $-0.5^{\circ}$  F. and a sensitivity of  $0.1^{\circ}$  F. The inspector found that sensor calibrations had not been performed, (P.20-21). The inspector also noted that a Con Edison audit report, QSR Audit 77-A10, had found problems with the system's sensitivity/accuracy requirements and that this item was in need of "corrections/resolutions," (P.22). A committee had been appointed to investigate the matter raised by this audit. This particular finding was covered in a memorandum from John J. Grob, Jr. to John R. Jannarone, Chairman of the EPC, which noted that the committee could find nothing to support the suggestion in the audit report that there was a requirement in the ETS for the sensitivity of the entire system. The ETS specifies the sensitivity only for the temperature sensors, not for the entire system for measuring delta T's across the circulating water system. This limitation was intentional when the ETS was drafted. There is no biological necessity for a high degree of accuracy in measurements of delta T's. The sensitivity of the

temperature sensors was specified simply because equipment with that level of sensitivity was readily available. This entire matter was discussed at an Environmental Protection Committee Meeting at which PASNY was represented. If any further action should be required, it will be coordinated with the individuals you have specified.

F. Request

This item relates to special studies required by the ETS. The contract with the consultant assigned to this special study should be modified to require periodic status reports on all special studies to be sent to the Authority as well as to Con Edison. This contract modification should also give Authority personnel authority equal to Con Edison personnel in monitoring.

Corrective Action

This item relates to the requirement that a correlation be developed between the maximum temperature in the discharge canal and the maximum surface temperature of the thermal plume. The correlation, discussed in Section 3.1.2.3 of the ETS, is to be developed from the results of the routine thermal surveys conducted pursuant to Section 4.1.1.a. Sufficient data has not yet been obtained to develop such a correlation, as was reported in the supplement to the 1977 Annual Report to the NRC.

This is not a special study being performed by contract with a consultant; the work is being done by Con Edison personnel. PASNY has been and will continue to be kept apprised of the thermal survey program, and has been given the opportunity to review all draft reports developed as part of that program.

We are satisfied that the responses to A and B are sufficient to assure compliance with NRC regulations, but feel that items C, D, E and F need further discussion in order to assure this compliance. We will keep you informed of progress being made toward corrective actions relating to items C, D, E and F.

Very truly yours,

  
J. P. Bayne  
Resident Manager

JWK/rbb

cc: John Griffin