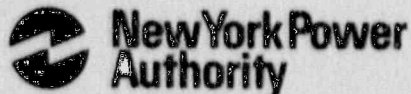


Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



Joseph E. Russell
Resident Manager

April 18, 1990
IP3-90-036
RAL-90-087B

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

Mr. James C. Linville, Chief
Reactor Projects Branch No. 1
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Inspection No. 50-286/90-01 and Associated Notice
of Violation (90-01-01)

Dear Mr. Linville:

Attachment I to this letter provides the Authority's
response to inspection report No. 50-286/90-01 and its
notice of violation (90-01-01).

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. E. Russell', written over the typed name.

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

JER:RAL/rl

Attachment

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

Resident Inspector's Office
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

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PDR ADOCK 05000286
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ATTACHMENT I
RESPONSE TO VIOLATION
90-01-01

VIOLATION:

Technical Specifications 6.8.1 requires that procedures be established and implemented for the procedures in Appendix A of Regulatory Guide 1.33. Sections A and E of Appendix A include procedures for procedure adherence, temporary procedure changes, shift turnover, log entries, and for correcting alarm conditions. Administrative Procedure AP-4 requires that procedures be followed and that temporary procedure changes be implemented when an approved procedure cannot be followed. Alarm response procedure ARP-12 part 22 requires that if a high pressure condition exists in service water header 31, 32, 33, the operator is to remove one service water pump from service if more than one is in service. Operations directive OD-6 includes a shift relief and turnover checklist which requires that abnormal conditions on the control room panels be corrected or explained on the checklist. Operations directive OD-5 requires that log sheet entries that exceed normal limits be circled and explained in the remarks section. OD-5 also requires that log book entries be made of significant operations, problems, abnormal indications or conditions.

1. Contrary to the above, on January 30 and 31, 1990, when high pressure in service water header 31, 32, 33 was alarmed, the second service water pump was not secured nor was a temporary procedure change prepared to allow continued operation of two pumps.
2. Contrary to the above, on the 3-11 shift on January 30 and the 11-7 shift on January 31, service water header 31, 32, 33 high pressure was not explained on the shift relief and turnover checklist, nor was this or any other abnormal condition circled and explained on the control room log sheets, nor was this condition and the component cooling water system leakage discussed in the senior reactor operator or shift supervisor's logs.

Collectively, these items constitute a Severity Level IV Violation (Supplement I).

RESPONSE:

The Authority has reviewed in detail the notice of violation outlined in Attachment A of NRC Inspection Report 90-01 and agrees that the events occurred as discussed.

The first item mentioned in the violation concerned failure to follow the directions of Alarm Response Procedure ARP-12.

ATTACHMENT I
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"Panel SJF, Cooling Water and Air" and remove one of the running service water pumps from service when a high service water header pressure condition occurred. The high pressure alarm could potentially indicate a low flow condition under which the service water pumps could degrade. As stated in the Inspection Report, the operators and shift supervisor decided that it was not necessary to secure a service water pump as long as adequate flow was maintained. The high service water header pressure condition occurred because the operators had started a second service water (SW) pump in order to increase SW header pressure to minimize component cooling water (CCW) leakage in a CCW heat exchanger. This decision was made during the implementation of ONOP-CC-1, "Loss of Component Cooling", which directs off normal CCW operation.

The appropriate action at the time would have been to initiate a Temporary Procedure Change (TPC) against ARP-12 reflecting the actions taken and the technical justifications for not following the procedure. In addition, those actions and conditions should have been logged in the control room log sheets for each subsequent shift.

The Operations Superintendent has directed that when conflicting conditions occur, such as between ARP-12 and ONOP-CC-1, and an approved procedure cannot be followed, the correct action is to process a procedure change in accordance with AP-3, "Procedure Preparation, Review and Approval", and AP-4, "Procedure Adherence and Use". The Authority believes the correct technical decision was made by the operations staff but that the error occurred in not following up that decision immediately by issuing a TPC against ARP-12.

The second item mentioned in the violation concerned failure to note and explain in the control room, senior reactor operator (SRO) and Shift Supervisor (SS) logs, the high pressure condition in the service water header. The inspection report also mentioned that a component cooling water system leakage was not discussed in either the SRO or SS logs.

The Operations Superintendent has directed that all abnormal conditions or parameters out of range shall be explained on the shift relief and turnover checklist and circled and explained on the control room log sheets in accordance with existing procedures. In addition, all SROs and SSs have been directed that any abnormal or unique plant condition shall be discussed in the SRO or SS logs.

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Because it was necessary to reemphasize the logkeeping and TPC policies to the operators, it has become apparent to the Authority, that not all of its staff has received the procedural adherence message strongly enough. To address this concern the Indian Point 3 (IP3) Resident Manager and Superintendent of Power will conduct meetings with the operations department SROs and SSs. They will impress upon the SROs and SSs the importance of ensuring staff procedural adherence at all times. The Authority intention is to complete these meetings by May 30, 1990.