



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 17, 1995

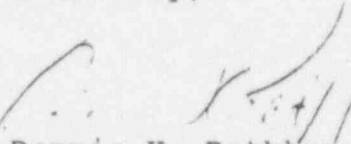
The Honorable Sherwood Boehlert
United States House of Representatives
Washington, DC 20515

Dear Congressman Boehlert:

This is to acknowledge receipt of your letter dated February 6, 1995, transmitting correspondence from your constituent, Norman Von Wettberg, regarding the Nuclear Regulatory Commission's General Design Criteria.

Please be assured that we are working on a response and a reply will be forwarded to you as soon as possible.

Sincerely,



Dennis K. Rathbun, Director
Office of Congressional Affairs



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 27, 1995

The Honorable Sue W. Kelly
United States House of Representatives
Washington, DC 20515-3219

Dear Congresswoman Kelly:

I am responding to your letter of June 28, 1995, to former Chairman Selin of the U.S. Nuclear Regulatory Commission, in which you expressed concern that every step be taken to ensure the safe operation of Indian Point Nuclear Generating Unit No. 3 (IP3). You also requested to be kept informed of the facility's progress during the restart.

As you know, IP3 was shut down by the New York Power Authority (NYPA) in February 1993, to correct several hardware issues and to implement plant-wide programmatic improvements. The plant restarted on June 27, 1995. The NRC has undertaken significant inspection and assessment efforts since the February 1993 shutdown to evaluate NYPA's progress in resolving technical concerns and correcting the underlying root causes of the identified deficiencies.

During the IP3 restart, the NRC implemented an augmented inspection plan to assess NYPA's activities. In addition to the three full-time resident inspectors assigned to the site, additional inspectors provided around-the-clock coverage for the first phase of the startup and maintained augmented inspection effort for about three weeks. During this time, among other NRC inspection activities, the inspectors reviewed NYPA's self-assessment of safety performance, quality assurance assessments, and support to operations on emergent issues. The staff reviewed the results of NYPA's self-assessment and on the basis of our independent augmented inspection effort, we agreed with the findings.

NYPA had committed not to increase reactor power above 40 percent until they performed a self-assessment and notified the NRC staff of the results. By letter dated July 6, 1995, NYPA notified the NRC staff of the results of this self-assessment. I have enclosed a copy of this letter for your information. The staff reviewed NYPA's self-assessment and, on the basis of our independent augmented inspection effort, we agreed with the results. Although our augmented startup inspection effort has ended, I assure you that until IP3 has operated at an improved performance level for a sustained period of time, the NRC staff will continue to oversee this facility at an enhanced level.

NYPA has also committed that, after achieving full-power operation, they will conduct a self-assessment of the restart process and will present the results to the NRC staff in a public meeting. The meeting will be held in the vicinity of the site and open for public observation, to be followed by a

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The Honorable Kelly

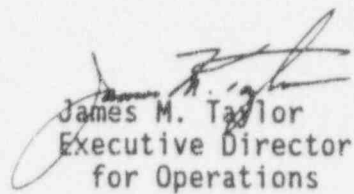
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question-and-answer session, allowing the public an opportunity to discuss issues with the NRC staff in attendance.

Regarding your request to be kept informed of the facility's progress, we would be glad to meet with you to provide any additional information you may need.

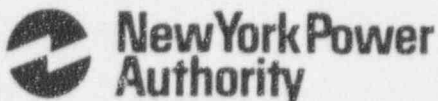
I trust this information addresses your request.

Sincerely,



James M. Taylor
Executive Director
for Operations

Enclosure: NYPA letter dated
July 6, 1995



William J. Cahill, Jr.
Chief Nuclear Officer

July 6, 1995
IPN-95-073

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Self Assessment During Plant Startup

REFERENCE: 1. NYPA letter IPN-95-065, W. J. Cahill, Jr., to NRC, "Readiness to Restart Indian Point 3," dated June 12, 1995.
2. NRC letter, T. Martin to W. Cahill, Jr., "Restart of the Indian Point 3 Nuclear Power Plant," dated June 19, 1995.

Dear Sir:

The New York Power Authority has completed a self-assessment of reactor restart and power ascension to 30% - 40% power at the Indian Point 3 Nuclear Power Plant. This period in the power ascension program provided an opportunity to assess, under operating conditions, performance of plant systems and the effectiveness of plant staff and administrative processes. The Power Authority committed to provide the self-assessment results to the NRC staff prior to exceeding 40% reactor power (References 1 and 2).

The assessment consisted of system walkdowns by engineering and operations personnel, self-assessments by Department Managers, an evaluation by the Independent Safety Engineering Group (ISEG), and surveillances by the Quality Assurance group. Assessment results were presented to the Plant Leadership Team (PLT), consisting of senior plant management, for critical review. A description of the self-assessment method and summary of results is provided in Attachment I.

The startup evolution following the replacement of the reactor vessel head O-ring has proceeded smoothly with few emergent issues requiring resolution. Conservative decision-making is evident at all levels in the organization and there is strong management involvement and control of activities. Results of the self-assessment indicate that actions taken to date by the Power Authority to improve performance at Indian Point 3 are effective.

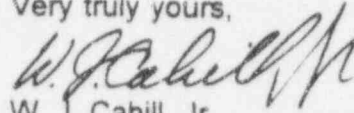
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Enclosure

The Power Authority concludes that plant equipment, personnel and administrative processes at Indian Point 3 can safely support the remaining power ascension activities and sustained operation at full power conditions. Additional assessment activities are planned during the balance of the power ascension program and results will be provided to the NRC in a public meeting after achieving full power operation.

There are no new commitments identified in this letter. If you have any questions, please contact me.

Very truly yours,



W. J. Cahill, Jr.
Chief Nuclear Officer

cc: Mr. Thomas T. Martin
Regional Administrator / Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. Curtis J. Cowgill, Chief
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U.S. Nuclear Regulatory Commission
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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant
P.O. Box 337
Buchanan, NY 10511

ATTACHMENT I TO IPN-95-073
SELF-ASSESSMENT OF REACTOR RESTART AND
POWER ASCENSION TO APPROXIMATELY 30% POWER
AT INDIAN POINT 3 NUCLEAR POWER PLANT

INTRODUCTION:

The New York Power Authority has completed a self-assessment of reactor restart and power ascension to approximately 30% to 40% power at the Indian Point 3 Nuclear Power Plant. The assessment covers the period from approximately June 20 to July 5, 1995. Plant heatup to normal operating temperature and pressure (following the reactor vessel O-ring replacement project) was completed on June 19. Steady state operation at the nominal 30% to 40% power plateau was achieved on July 3. The purpose of this assessment was to provide a systematic approach to evaluating the performance of plant systems, administrative processes, and personnel during this period.

The Power Authority committed to provide the self-assessment results to the NRC prior to increasing reactor power above 40% (References 1 and 2). The following sections describe the method, results and conclusions of the self-assessment.

SELF-ASSESSMENT METHOD:

The Power Authority prepared a Startup and Power Ascension Plan (Reference 3) which provides the overall structure and sequence for plant startup following the outage that began in 1993. Written guidance for conducting the self-assessment is included in the Plan. The format of this self-assessment models the assessment (i.e., Start Up Readiness Evaluation) which was performed prior to restart to demonstrate the effectiveness of corrective actions implemented at Indian Point 3 (Reference 4). The four elements of the Start Up Readiness Evaluation were:

1. System Certification to assure acceptable material condition.
2. The Operational Readiness Review consisting of a self assessment by Department Managers.
3. The Startup Evaluation for Readiness Team Inspection to independently assess plant and organizational readiness.
4. Quality Assurance independent oversight.

Assessment activities during plant startup and power ascension were developed which correspond to each of these four elements of the Start Up Readiness Evaluation. This approach provides assurance that the attributes and conclusions which supported the restart decision remain valid as the plant equipment and personnel make the transition from an outage to an operating facility. The startup and power ascension self assessment consisted of:

1. System walkdowns by system engineers and plant operators.
2. Self assessments by specified Department Managers.
3. An independent review by the Independent Safety Evaluation Group (ISEG) to ensure the operational and functional capability of the plant to support the continuation of the startup sequence.
4. Quality Assurance independent oversight.

The assessment also included a data collection effort to provide additional quantitative evidence of performance. Data was collected for selected plant process parameters and for measures of staff and administrative program effectiveness.

All assessment activities, results and conclusions were subjected to critical review by the Plant Leadership Team (PLT) during assessment hold point meetings. The PLT consists of senior on-site management personnel and has an ongoing responsibility to ensure management involvement with plant activities and to implement programs which facilitate safe operation.

System Walkdowns

During the course of plant startup, system walkdowns were conducted by system engineers and operations personnel. Walkdowns were performed to provide assurance that the material condition established as part of the pre-startup system certification program was being maintained. Equipment performance was observed as the various plant systems were placed in service. Written guidance covering material condition, housekeeping, and radiological protection where applicable was provided in the startup plan for personnel performing walkdowns.

Department Manager Self-Assessments

Self-assessments by selected Department Managers were performed to verify that their respective departments met applicable performance standards during the startup and power ascension evolution. Performance standards were defined for approximately twenty subject areas such as operator knowledge, acceptability of procedures, control of work activities, and implementation of management policies. Written guidance in the startup plan provided the Department Managers with evaluation attributes and criteria which could be used to determine if specified performance standards were achieved. Department Managers were required to present the results of their self-assessment to the Plant Leadership Team for critical review.

Independent Safety Engineering Group Review

The Independent Safety Engineering Group (ISEG) consists of the ISEG Director and a Senior Assessment Engineer at each of the Power Authority's two nuclear plants. The ISEG conducted interviews, reviewed documents, and observed work-in-progress to evaluate operations, maintenance, and engineering activities. Equipment operation was also observed and related documents were reviewed to assess the physical plant in areas such as thermal expansion and radiological, chemistry, and ambient environmental conditions. The ISEG also performed a review of low power reactor physics test results.

Quality Assurance Oversight

The site Quality Assurance department conducted a surveillance of plant performance during the period following senior management approval to restart the reactor to the holdpoint prior to exceeding 30% power. This surveillance provided a broad assessment of plant and

personnel performance with the purpose of determining if Indian Point 3 is ready to operate at full power. The surveillance included results from ongoing QA activities such as an Operations Audit and recently completed QA surveillances. Quality Assurance provided oversight during startup and power ascension in the following areas:

- Organization and Administration
- Material condition and housekeeping
- Test coordination and execution
- Operations
- Maintenance
- Instrumentation and controls
- Technical support
- Radiation control
- Chemistry

Quality Assurance oversight focused on field observations, during day shift and back shift periods, and included evaluations of communications, management oversight and control, departmental self-assessments, decision making, and procedure adherence.

SELF-ASSESSMENT RESULTS:

System Walkdowns

System walkdowns were performed at various times during startup so that equipment and system performance under changing plant conditions could be observed and to ensure that plant material condition was being maintained. Several minor items were documented as Plant Identified Deficiencies (PIDs). There are no remaining open items which prevent continued power ascension or adversely affect safe plant operation.

Additionally, there are approximately 130 Work Requests (WRs) remaining to be completed during the balance of the power ascension program. Many of these work items involve retests of recently completed corrective maintenance activities or require plant conditions above the current power level. Temporary modifications and operator work arounds are periodically reviewed to ensure they are consistent with established guidelines.

Department Manager Self-Assessments

Department Managers presented their self-assessment results to the PLT during meetings held on July 3, 4, and 5, 1995. The self-assessments identified strengths as well as areas for potential improvement. There were no weaknesses identified which would prevent their respective organizations from supporting continued power ascension to full power. Areas of future improvement are primarily in the areas of further streamlining of procedures and administrative processes. Plant staff continue to exhibit a positive and questioning attitude in the self-identification and reporting of problems.

Independent Safety Engineering Group Review

The overall conclusion of the ISEG review is that plant operation during the assessment period was conducted safely and activities were performed conservatively. Work activities are well planned particularly when a Limiting Condition for Operation (LCO) is involved. The plant is responsive to emergent issues with options and consequences being carefully evaluated before actions are taken. The ability of the organization to anticipate events before they become emergent issues could be improved. Communication within and between departments has significantly improved and additional progress can be made in the handoff of work activities from one group to the next responsible department.

Quality Assurance Oversight

Throughout the period of startup and power ascension significant improvement was noted compared to previous outages in the management and control of plant activities and material condition. Startup activities are proceeding cautiously and quality is given priority over schedule. Problems are being properly documented, brought to management attention, evaluated conservatively and resolved. Management is maintaining good visibility and control of activities prior to each startup milestone. Personnel in all departments are demonstrating good questioning attitudes, attention to detail, and adherence to procedures. Operations is controlling plant configuration and ensuring compliance with Technical Specifications and Operational Specifications. While some weaknesses were identified, the Quality Assurance surveillance did not identify any generic or specific problem area or concern which would prevent Indian Point 3 from safely continuing with the startup to full power operation.

CONCLUSION:

The self assessment demonstrated that the improvement initiatives implemented to date by the Power Authority are effective in assuring the safe operation of Indian Point 3. There is evidence of strong management involvement and control of activities. Management expectations regarding the importance of nuclear safety have been well communicated, resulting in conservative decision-making at all levels in the organization. Only one reactor trip occurred to date during the startup evolution. The trip was manually initiated and was the result of a conservative approach by plant operators.

Plant systems have performed well during reactor restart and power ascension. Plant staff have proper skills and exhibit good teamwork in responding to and resolving emergent issues. Administrative programs such as Deviation and Event Reporting (DER) and the Action and Commitment Tracking System (ACTS) provide tools for plant staff to implement an effective corrective action program.

A continuation of self-assessment activities is part of the Power Authority's plan for long term improvements at Indian Point 3. Self-assessment activities are an ongoing administrative tool which provide benefits both for management to identify areas for improvement and for plant

staff to develop a greater understanding of management expectations, including a commitment to resolving concerns.

The Power Authority concludes that plant equipment, personnel and administrative processes at Indian Point 3 can safely support the remaining power ascension activities and sustained operation at full power conditions.

REFERENCES:

1. NYPA letter IPN-95-065, W. J. Cahill, Jr., to NRC, "Readiness to Restart Indian Point 3," dated June 12, 1995.
2. NRC letter, T. Martin to W. Cahill, Jr., "Restart of the Indian Point 3 Nuclear Power Plant," dated June 19, 1995.
3. NYPA Procedure SUP-95-01, "Startup and Power Ascension Procedure."
4. NYPA letter IPN-95-036, W. J. Cahill to NRC, "Start Up Readiness Evaluation," dated March 16, 1995.

SUE W. KELLY
19TH DISTRICT, NEW YORK

COMMITTEE ON
TRANSPORTATION AND INFRASTRUCTURE
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ASSISTANT MAJORITY WHIP

Congress of the United States
House of Representatives
Washington, DC 20515-3219

PLEASE REPLY TO:
☐ 1037 LONGWORTH HOUSE OFFICE BUILDING
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(202) 225-5441
☐ 21 OLD MAIN STREET, ROOM #205
FISHKILL, NEW YORK 12524
(914) 897-5200
☐ 105 SOUTH BEDFORD ROAD, ROOM #312-A
MT. KISCO, NEW YORK 10549
(914) 241-6340

June 28, 1995

Mr. Ivan Selin
Chairman, Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852

Dear Mr. Selin:

With the restart of the Indian Point 3 nuclear power plant in Westchester County, New York, I would like to express in the strongest possible terms my concern that every step be taken to ensure the safety of this facility's continued operation.

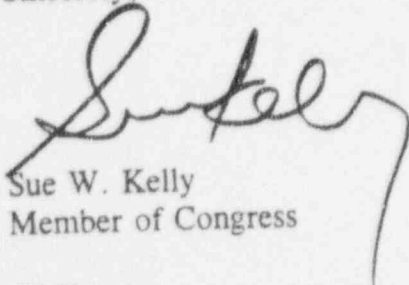
As you know, equipment and management problems forced the shutdown of the Indian Point 3 facility in 1993. Since that time, the New York Power Authority has revamped the management team at the facility and implemented operational improvements to correct the deficiencies which prompted the shutdown. Based on these improvements, the Nuclear Regulatory Commission has approved the Power Authority's plan to restart the facility.

Nuclear energy can play an important role in satisfying our energy needs, but not at the expense of public safety. I have heard from a number of my constituents expressing concerns over the restart of Indian Point 3. Their concerns underscore the primary view that the operational reforms made at the facility must place the highest priority on safety. Anything less is clearly unacceptable.

The Nuclear Regulatory Commission must carefully oversee and monitor the restart of Indian Point 3, and I would like to be kept informed on the facility's progress.

Thank you for your attention in this matter. If I can provide you with additional information on this matter, please do not hesitate to contact me.

Sincerely,



Sue W. Kelly
Member of Congress

SWK/svh