

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



William A. Josiger
Resident Manager

November 30, 1988
IP3-88-071
JAS-88-136B

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

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

SUBJECT: Inspection No. 50-286/88-17


Dear Mr. Wenzinger:

This letter provides the Authority's response to your
Inspection Report No. 50-286/88-17 dated November 3, 1988 and
received at this office November 14, 1988.

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. M. Peckham of my staff.

Sincerely,


William A. Josiger
Resident Manager
Indian Point Unit 3
Nuclear Power Plant

WAJ:JAS:lh

Attachment

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VIOLATION:

10CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures or drawings. Administrative Procedure (AP) 27.2, Revision 3, "Housekeeping and Cleanliness of Fluid Systems" requires good housekeeping of the plant and AP-22, Revision 6, "Conduct of Maintenance" requires that after completion of work, the maintenance supervisor shall ensure cleanliness of the work site.

Contrary to the above, on September 15, 1988, measures to ensure good housekeeping and cleanliness of the plant were not effective in that the emergency diesel generator rooms, the 480 volt switchgear room, the auxiliary boiler feed pump room, and the turbine building exhibited degraded housekeeping practices as indicated by debris including smoked cigarette butts, oil soaked rags, beverage containers, and food wrappers. This was evidence that the maintenance supervisor did not ensure cleanliness of the work site.

RESPONSE

As specified in AP-27.2, housekeeping is intended to help assure that good operation and maintenance practices are utilized and that the operability of equipment is not degraded as a result of housekeeping techniques. The Power Authority agrees that work site and general plant cleanliness are important aspects of a well run facility and that increased attention is required by all members of the plant staff including the bargaining unit and particularly station management. It is necessary to point out that the operability of the Emergency Diesel Generators, the 480 volt switchgear, the auxiliary boiler feed pumps, the turbine, related components and equipment was never in question or degraded in any way by the presence of the "debris" specified in the violation above.

To improve the overall maintenance condition and cleanliness of the plant the Power Authority has instituted a material condition inspection program. This program was formalized January 1, 1988 as a maintenance directive and was later incorporated into station policy as an Administrative Procedure. This procedure addresses material condition and housekeeping practices as well as a formal reporting and corrective action follow system that is fully integrated into the station work control program. Since the beginning of

November, daily inspection tours of the plant by maintenance personnel have been instituted. The results of these tours are communicated to station management at the morning meeting. Areas of the plant requiring attention are identified and corrective actions specified. Frequency of plant tours by station management have also been increased.

These programs have been fully implemented and have been demonstrated to be effective in improving the housekeeping and cleanliness of the plant.

The Power Authority remains sensitive to the NRC's concern in this area and believes that an effective program has been established. Management attention will continue to be focused and maintained to insure acceptable results.

cc: Document Control Desk (original)
U.S. Nuclear Regulatory Commission
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