

**A. Alan Blind**  
Vice President



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February 14, 2000

Re: Indian Point Unit No. 1  
Docket No. 50-3

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555-0001

Subject: Proposed Technical Specification Amendment Consisting of  
Administrative Changes

Transmitted herewith is an "Application for Amendment to the Operating License," sworn on February 14, 2000. This application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit No. 1 Technical Specifications. In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

The proposed administrative changes consist of the following:

- a) Changes to Sections 3.1.2, 3.2.1, and 4.1.8.1.b to reflect organizational title changes, and
- b) Change to Section 4.1.8.1 to reference the current sections of 10 CFR 20.

Attachment I to this letter provides the proposed changed pages, Attachment II provides the proposed changes as markups on the existing Technical Specification pages, and Attachment III provides the Safety Assessments. It has been determined that the administrative changes set forth herein do not represent a significant hazards consideration as defined by 10 CFR 50.92(c).

A501

Should you or your staff have any questions regarding this submittal, please contact Mr. John F. McCann, Manager, Nuclear Safety and Licensing.

Very truly yours,

*Robert E. Lane*  
for A. Blind

Attachments

cc: Mr. Hubert J. Miller  
Regional Administrator-Region I  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
CONSOLIDATED EDISON COMPANY ) Docket No. 50-3  
OF NEW YORK, INC. )  
(Indian Point Station, Unit No. 1) )

APPLICATION FOR AMENDMENT  
TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Facility Operating License No. DPR-5, hereby applies for amendment of the Technical Specifications contained in Appendix A of this license.

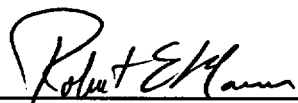
This Application for amendment to the Indian Point 1 Technical Specifications seeks to propose administrative changes to the following:

- a) Changes to Sections 3.1.2, 3.2.1, and 4.1.8.1.b to reflect organizational title changes, and
- b) Change to Section 4.1.8.1 to reference the current sections of 10 CFR 20.

The specific proposed Technical Specification Revisions are set forth in Attachment I to this Application. A mark-up of the existing Technical Specifications are provided in Attachment II. Safety Assessments of the proposed changes are set forth in Attachment III to this Application. These assessments demonstrate that the proposed changes do not represent a significant hazards consideration as defined in 10 CFR 50.92(c).

As required by 10 CFR 50.91(b)(1), a copy of this Application and our analysis concluding that the proposed changes do not constitute a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY:

  
for A. Alan Blind  
Vice President - Nuclear Power

Subscribed and sworn to  
before me this 14<sup>th</sup> day  
February, 2000.

  
Notary Public

ELIZABETH A. MELANSON  
Notary Public, State of New York  
No. 01ME4878094  
Qualified in Orange County  
Commission Expires Feb. 9, 2001

**ATTACHMENT I**

**PROPOSED TECHNICAL SPECIFICATION CHANGES**

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 1  
DOCKET NO. 50-3  
FEBRUARY 2000**

2.10.2.5 If a spent fuel pool contains spent fuel, the spent fuel cask shall not be moved over that pool or within a distance of that pool such that the cask could strike the pool if it fell or tipped.

2.10.2.6 A dead-load test shall be successfully performed on the fuel handling building crane before fuel movement begins. The load assumed by the crane for this test must be equal to or greater than the maximum load to be assumed by the crane during the fuel handling operation. A thorough visual inspection of the crane shall be made after the dead-load test and prior to fuel handling.

\* Licensed Operator for IP-2

### 2.11 Fire Protection

Overall site fire protection is provided by a fire protection system which is common to both Unit No. 1 and Unit No. 2. Operation, maintenance and testing are controlled by station procedures.

Fire protection and detection systems provided for the protection of Indian Point Unit No. 2 safe shutdown systems are addressed in Appendix A to the Indian Point Unit No. 2 Facility Operating License No. DPR-26.

## 3.0 ADMINISTRATIVE AND PROCEDURAL SAFEGUARDS

### 3.1 Responsibility

3.1.1 The Vice President-Nuclear Power shall be responsible for overall facility activities and shall delegate in writing the succession to this responsibility during his absence.

3.1.2 The Plant Manager shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

## **3.2 Organization**

- 3.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.**
- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR for Indian Point Unit No. 2.**
  - b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.**
  - c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.**
  - d. Individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager, however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.**
  - e. The operation of the facility, the operating organization, the procedures for operation, and modifications to the facility shall be subject to review by the Station Nuclear Safety Committee. The committee shall report to the Vice President-Nuclear Power.**

- f. **The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in areas of nuclear engineering, chemistry, radiochemistry, metallurgy and non-destructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls and quality assurance activities, and radiological environmental effects.**
- g. **All fuel handling shall be under the direct supervision of a licensed operator.\***
- h. **The Shift Manager is responsible for operations at the Unit No. 1 facility.**
- i. **The qualification requirements of the Operations Manager and the Assistant Operations Manager are provided in Sections 6.2.2 and 6.3 of Appendix A to the Indian Point Unit No. 2 Facility Operating License No. DPR-26.**

**\* Licensed operator for IP-2**

### **3.3 Operating Instructions and Procedures**

- 3.3.1 No fuel will be loaded into the reactor core or moved into the reactor containment building without prior review and authorization by the Nuclear Regulatory Commission.**
- 3.3.2 Detailed written instruction setting forth procedures used in connection with the operation and maintenance of the nuclear power plant shall conform to the Technical Specifications.**
- 3.3.3 Operation and maintenance of equipment related to safety when there is no fuel in the reactor shall be in accordance with written instructions.**

#### **4.1.7 Radiation Protection Program**

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

#### **4.1.8 High Radiation Area**

**4.1.8.1 As an acceptable alternative to the "control device" or "alarm signal" required by 10 CFR 20.1601(a) and 10 CFR 20.1601(b):**

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.**
- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 4.1.8.1(a) above, and, in addition, locked doors shall be provided to prevent unauthorized entry to such areas and the keys shall be maintained under the administrative control of the Radiation Protection Manager and/or the Shift Manager on duty.**

#### **4.1.9 Spent Fuel Storage and Handling**

**4.1.9.1 All irradiated fuel shall be stored in the racks provided in the Fuel Handling Building Storage pools, with sufficient shielding that ensures that the radiation level on the operating deck is  $\leq 15$  mr/hr. Should the radiation level be found to be above 15 mr/hr, corrective action shall be initiated to restore the level to  $\leq 15$  mr/hr.**



**ATTACHMENT II**

**PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGES**

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 1  
DOCKET NO. 50-3  
FEBRUARY 2000**

On these marked-up pages from the current Tech Specs:

Additions are shown by *bold italic*,

and

Deletions are shown by ~~double-strikethrough~~.

2.10.2.5 If a spent fuel pool contains spent fuel, the spent fuel cask shall not be moved over that pool or within a distance of that pool such that the cask could strike the pool if it fell or tipped.

2.10.2.6 A dead-load test shall be successfully performed on the fuel handling building crane before fuel movement begins. The load assumed by the crane for this test must be equal to or greater than the maximum load to be assumed by the crane during the fuel handling operation. A thorough visual inspection of the crane shall be made after the dead-load test and prior to fuel handling.

**\* Licensed Operator for IP-2**

**2.11 Fire Protection**

Overall site fire protection is provided by a fire protection system which is common to both Unit No. 1 and Unit No. 2. Operation, maintenance and testing are controlled by station procedures.

Fire protection and detection systems provided for the protection of Indian Point Unit No. 2 safe shutdown systems are addressed in Appendix A to the Indian Point Unit No. 2 Facility Operating License No. DPR-26.

~~\* Licensed Operator for IP-2~~

**3.0 ADMINISTRATIVE AND PROCEDURAL SAFEGUARDS**

**3.1 Responsibility**

3.1.1 The Vice President-Nuclear Power shall be responsible for overall facility activities and shall delegate in writing the succession to this responsibility during his absence.

3.1.2 The ~~General Manager-Nuclear Power Generation~~ **Plant Manager** shall be responsible for facility operations and shall delegate in writing the succession to this responsibility during his absence.

## 3.2 Organization

- 3.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.
- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR for Indian Point Unit No. 2.
  - b. ~~The General Manager Nuclear Power Generation~~ **Plant Manager** shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
  - c. The Vice President-Nuclear Power shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
  - d. Individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager, however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
  - e. The operation of the facility, the operating organization, the procedures for operation, and modifications to the facility shall be subject to review by the Station Nuclear Safety Committee. The committee shall report to the Vice President-Nuclear Power.

- f. The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in areas of nuclear engineering, chemistry, radiochemistry, metallurgy and non-destructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls and quality assurance activities, and radiological environmental effects.
- g. All fuel handling shall be under the direct supervision of a licensed operator.\*
- h. ~~The Senior Watch Supervisor~~ **Shift Manager** is responsible for operations at the Unit No. 1 facility.
- i. The qualification requirements of the Operations Manager and the Assistant Operations Manager are provided in Sections 6.2.2 and 6.3 of Appendix A to the Indian Point Unit No. 2 Facility Operating License No. DPR-26.

\* Licensed operator for IP-2

### 3.3 Operating Instructions and Procedures

- 3.3.1 No fuel will be loaded into the reactor core or moved into the reactor containment building without prior review and authorization by the Nuclear Regulatory Commission.
- 3.3.2 Detailed written instruction setting forth procedures used in connection with the operation and maintenance of the nuclear power plant shall conform to the Technical Specifications.
- 3.3.3 Operation and maintenance of equipment related to safety when there is no fuel in the reactor shall be in accordance with written instructions.

#### 4.1.7 Radiation Protection Program

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

#### 4.1.8 High Radiation Area

4.1.8.1 As an acceptable alternative to the "control device" or "alarm signal" required by ~~paragraph 20.203(e)(2) of 10 CFR 20;~~  
**10 CFR 20.1601(a) and 10 CFR 20.1601(b):**

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 4.1.8.1(a) above, and, in addition, locked doors shall be provided to prevent unauthorized entry to such areas and the keys shall be maintained under the administrative control of the Radiation Protection Manager and/or the ~~Senior Watch Supervisor~~ **Shift Manager** on duty.

#### 4.1.9 Spent Fuel Storage and Handling

4.1.9.1 All irradiated fuel shall be stored in the racks provided in the Fuel Handling Building Storage pools, with sufficient shielding that ensures that the radiation level on the operating deck is  $\leq 15$  mr/hr. Should the radiation level be found to be above 15 mr/hr, corrective action shall be initiated to restore the level to  $\leq 15$  mr/hr.

**ATTACHMENT III**

**SAFETY ASSESSMENTS**

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 1  
DOCKET NO. 50-3  
FEBRUARY 2000**

## **Introduction**

**In this Attachment, separate safety assessments are provided, one for each of the following proposed administrative changes:**

- a) Changes to Sections 3.1.2, 3.2.1, and 4.1.8.1.b to reflect organizational title changes, and**
- b) Change to Section 4.1.8.1 to reference the current sections of 10 CFR 20.**



**a) Changes To Sections 3.1.2, 3.2.1, and 4.1.8.1.b To Reflect Organizational Title Changes**

**SECTION I - Description of Change**

In Sections 3.1.2 and 3.2.1.b change “General Manager-Nuclear Power Generation” to “Plant Manager.” In Sections 3.2.1.h and 4.1.8.b change “Senior Watch Supervisor” to “Shift Manager.” In addition, the footnote, “\* Licensed Operator for IP-2” was moved to just after subsection 2.10.2.6.

**SECTION II - Evaluation of Change**

These are changes in title only. There is no change in responsibilities or functions performed by these individuals. These are administrative changes that affects only the “management” aspect of the plant. The movement of the footnote was to reflect that the footnote pertains to the text in Subsection 2.10.2 (specifically Subsection 2.10.2.4). These changes do not affect any equipment or physical plant attributes.

In the Unit No. 2 Technical Specification Amendment, 198, issued August 1998, the title of “General Manager-Nuclear Power Generation” was changed to “Plant Manager.” At the time of this Unit 2 amendment, Unit No. 1 Technical Specification Sections 3.1.2 and 3.2.1.b should have been changed, but were overlooked.

**a) Changes To Sections 3.1.2, 3.2.1, and 4.1.8.1.b To Reflect Organizational Title Changes**

**SECTION III - No Significant Hazards Evaluation**

The proposed changes do not involve a significant hazards consideration because:

- 1) Does the proposed license amendment involve a significant increase in the probability or in the consequences of an accident previously evaluated?

No. The proposed change is administrative in nature. The changes involve updating Sections 3.2.1.h and 4.1.8.b to use the title "Shift Manager" instead of "Senior Watch Supervisor" and updating Sections 3.1.2 and 3.2.1.b to use the title "Plant Manager" instead of "General Manager-Nuclear Power Generation" and movement of the footnote, "\* Licensed Operator for IP-2." These changes do not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety System Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed changes would not involve a significant increase in the probability or in the consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed changes are administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently no new failure modes are introduced as a result of the proposed change. Therefore, the proposed changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

No. The proposed changes are administrative in nature. Since there are no changes to the operation of the facility or the physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

**a) Changes To Sections 3.1.2, 3.2.1, and 4.1.8.1.b To Reflect Organizational Title Changes**

**SECTION IV - Impact Of Changes**

This change will not adversely impact the following:

ALARA Program  
Security and Fire Protection Programs  
Emergency Plan  
UFSAR or SER Conclusions  
Overall Plant Operations and the Environment

The changes involve updating Sections 3.2.1.h and 4.1.8.b to use the title "Shift Manager" instead of "Senior Watch Supervisor" and updating Sections 3.1.2 and 3.2.1.b to use the title "Plant Manager" instead of "General Manager-Nuclear Power Generation" and movement of the footnote, "\* Licensed Operator for IP-2." For the title changes, the UFSAR is in the process of being updated. For the footnote, this level of detail is not listed or implied in the UFSAR, and thus, there is no UFSAR impact. There are no new failure modes introduced by this change. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected.

**SECTION V - Conclusion**

Therefore, the proposed changes to the Technical Specifications do not involve a significant hazards consideration. In addition, the proposed change to the Technical Specifications has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed changes do not represent a significant hazards consideration.

**b) Change To Section 4.1.8.1 To Reference The Current Sections Of 10 CFR 20**

**SECTION I - Description of Change**

In Section 4.1.8.1 change "As an acceptable alternative to the 'control device' or 'alarm signal' required by paragraph 20.203(c)(2) of 10 CFR 20" to "As an acceptable alternative to the 'control device' or 'alarm signal' required by 10 CFR 20.1601(a) and 10 CFR 20.1601(b)."

**SECTION II - Evaluation of Change**

The NRC had completely revised 10 CFR 20 in 1991, and 10 CFR 20.203(c)(2) is now defunct. The appropriate references for Section 4.1.8.1 are 10 CFR 20.1601(a) and 10 CFR 20.1601(b).

In 10 CFR 20.1601 it states:

- "(a) The licensee shall ensure that each entrance or access point to a high radiation area has one or more of the following features --
- (1) A control device that, upon entry into the area, causes the level of radiation to be reduced below that level at which an individual might receive a deep-dose equivalent of 0.1 rem (1 mSv) in 1 hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates;
  - (2) A control device that energizes a conspicuous visible or audible alarm signal so that the individual entering the high radiation area and the supervisor of the activity are made aware of the entry; or
  - (3) Entryways that are locked, except during periods when access to the areas is required, with positive control over each individual entry.
- (b) In place of the controls required by paragraph (a) of this section for a high radiation area, the licensee may substitute continuous direct or electronic surveillance that is capable of preventing unauthorized entry.
- (c) A licensee may apply to the Commission for approval of alternative methods for controlling access to high radiation areas."

By law, Indian Point 1 is required to comply and does comply with this statement. This change is to remove any ambiguity that may have existed in Section 4.1.8 by referring to a defunct 10 CFR 20 Section.

This change is considered administrative since there is no change in the function, operation or physical configuration of the plant.

**b) Change To Section 4.1.8.1 To Reference The Current Sections Of 10 CFR 20**

**SECTION III - No Significant Hazards Evaluation**

The proposed change does not involve a significant hazards consideration because:

- 1) Does the proposed license amendment involve a significant increase in the probability or in the consequences of an accident previously evaluated?

No. The proposed change is administrative in nature. The change involves updating Section 4.1.8.1 to reference 10 CFR 20.1601(a) and 10 CFR 20.1601(b). This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety System Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed change would not involve a significant increase in the probability or in the consequences of an accident previously evaluated.

- 2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected. Consequently no new failure modes are introduced as a result of the proposed change. Therefore, the proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Does the proposed amendment involve a significant reduction in a margin of safety?

No. The proposed change is administrative in nature. Since there are no changes to the operation of the facility or the physical design, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

**b) Change To Section 4.1.8.1 To Reference The Current Sections Of 10 CFR 20**

**SECTION IV - Impact Of Changes**

This change will not adversely impact the following:

ALARA Program  
Security and Fire Protection Programs  
Emergency Plan  
UFSAR or SER Conclusions  
Overall Plant Operations and the Environment

The change involves updating Section 4.1.8.1 to reference 10 CFR 20.1601(a) and 10 CFR 20.1601(b). This level of detail is not listed or implied in the UFSAR. Therefore, there is no UFSAR impact. There are no new failure modes introduced by this change. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and emergency procedures are unaffected.

**SECTION V - Conclusion**

Therefore, the proposed change to the Technical Specifications does not involve a significant hazards consideration. In addition, the proposed change to the Technical Specifications has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed change does not represent a significant hazards consideration.