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James Knubel
Senior Vice President and
Chief Nuclear Officer

June 7, 2000
IPN-00-042

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
**Proposed Changes to the Administrative
Section of Technical Specifications**

Dear Sir:

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise TS 6.2.2, "Plant Staff", item (i) requirements for a Senior Reactor Operator License. The revision will require either the Operations Manager or the Assistant Operations Manager to hold a Senior Reactor Operator (SRO) License. Additionally, the amendment will delete the title "Shift Manager." On-shift crew license requirements are delineated in other sections of TS 6.2.2. The purpose is to allow flexibility for reorganization or personnel changes without needing a TS change. This is a line item change. These changes reflect the wording used in Standard Technical Specifications and the changes made in the IP3 Improved Technical Specifications.

Enclosed for filing is the signed original of a document entitled, "Application for Amendment to Operating License." Attachment I to the application contains the proposed changes to the Technical Specification, Attachment II contains the associated safety evaluation. A mark-up of the affected Technical Specification pages is provided in Attachment III for information only.

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.

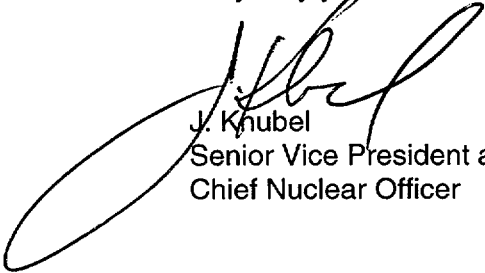
NRR-057

ADDI

The Authority is making no commitments in this letter.

If you have any questions, please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,



J. Khubel
Senior Vice President and
Chief Nuclear Officer

Attachments

cc: U.S. Nuclear Regulatory Commission
475 Allendale Road
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Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of)
POWER AUTHORITY OF THE STATE OF NEW YORK) Docket No. 50-286
Indian Point 3 Nuclear Power Plant)

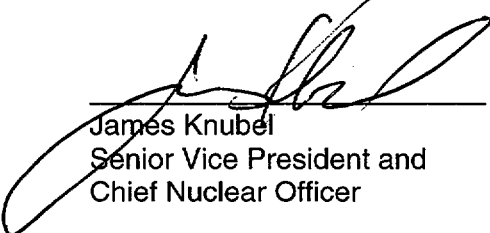
APPLICATION FOR AMENDMENT TO THE OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, the Power Authority of the State of New York, as holder of the Facility Operating License No. DPR-64, hereby applies for an amendment to the Technical Specifications contained in Appendix A of the license.

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise TS 6.2.2, "Plant Staff", item (i) requirements for a Senior Reactor Operator License. The revision will require either the Operations Manager or the Assistant Operations Manager to hold a Senior Reactor Operator (SRO) License. Additionally, the amendment will delete the title "Shift Manager." On-shift crew license requirements are delineated in other sections of TS 6.2.2. The purpose is to allow flexibility for reorganization or personnel changes without needing a TS change. This is a line item change. These changes reflect the wording used in Standard Technical Specifications and the changes made in the IP3 Improved Technical Specifications.

The proposed changes to the Technical Specification are presented in Attachment I to this application. The Safety Evaluation is included in Attachment II.

**POWER AUTHORITY OF THE
STATE OF NEW YORK**


James Knubel
Senior Vice President and
Chief Nuclear Officer

**STATE OF NEW YORK
COUNTY OF WESTCHESTER**

Subscribed and sworn to before me
this 7th day of June 2000.


Notary Public

EILEEN E. O'CONNOR
Notary Public, State of New York
No. 4991062
Qualified in Westchester County
Commission Expires January 21, 2002

ATTACHMENT I TO IPN-00-042

**PROPOSED CHANGES TO THE ADMINISTRATIVE
SECTION OF THE TECHNICAL SPECIFICATIONS**

Revise Appendix A as follows:

Remove Page

6-3

Insert Page

6-3

**NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
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DPR-64**

- g) Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, auxiliary operators and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an 8 to 12 hour day, nominal 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168 hour period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, shift turnover time can be included in the breaktime.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or his designee, or higher levels of management, in accordance with established procedures.

- h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.
- i) The Operations Manager or the Assistant Operations Manager shall hold a Senior Reactor Operator (SRO) license.

ATTACHMENT II TO IPN-00-042

**SAFETY EVALUATION FOR THE
PROPOSED CHANGES TO THE ADMINISTRATIVE
SECTION OF THE TECHNICAL SPECIFICATIONS**

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SECTION I - DESCRIPTION OF CHANGES

This application for amendment to the Indian Point 3 (IP3) Technical Specifications (TS) proposes to revise TS 6.2.2, "Plant Staff", item (i) requirements for a Senior Reactor Operator License. The revision will require either the Operations Manager or the Assistant Operations Manager to hold a Senior Reactor Operator (SRO) License. Additionally, the amendment will delete the title "Shift Manager." On-shift crew license requirements are delineated in other sections of TS 6.2.2. The purpose is to allow flexibility for reorganization or personnel changes without needing a TS change. This is a line item change. These changes reflect the wording used in Standard Technical Specifications and the changes made in the IP3 Improved Technical Specifications.

Replace:

The Assistant Operations Manager and Shift Manager shall hold a Senior Reactor Operator (SRO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3.

With:

The Operations Manager or the Assistant Operations Manager shall hold a Senior Reactor Operator (SRO) license.

SECTION II - PURPOSE

The purpose of this change is to allow flexibility for reorganization or personnel changes

SECTION III - EVALUATION OF CHANGES

This revision to the TS will allow either the Operations Manager or the Assistant Manager to hold a SRO license. The purpose of this change is to allow flexibility for reorganization or personnel changes. This change will ensure that at least one member of the line management organization has the plant knowledge required to obtain and hold a current SRO license. Whom ever holds that SRO license will directly supervise the day to day plant operations. This function may be carried out by either the Operations Manager or the Assistant Operations Manager. The intent of ANSI N18.1, with respect to the operations manager qualifications, can be met by either position or both. Administrative Procedures will ensure that the Shift Supervisors report directly to the individual who holds a current SRO license.

If it is the Operations Manager who no longer meets the qualification requirements for operation manager as listed in ANSI N18.1-1971, TS Section 6.3.1 states that the Operations Manager shall meet the requirements of ANSI N18.1-1971 with the exception of the SRO license requirements. The SRO license requirement would be met by the Assistant Operations Manager.

At IP3, "Shift Manager" is the NYPA specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. Therefore, this requirement is redundant to 10 CFR 50.54 (m)(2)(ii) and is being deleted in the current technical specifications.

SECTION IV - NO SIGNIFICANT HAZARDS EVALUATION

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based upon the following information:

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

No. This change allows either the Operations Manager or Assistant Operations Manager to be SRO licensed. This is an administrative change. The Operations department will still have an SRO licensed individual overseeing the operating crews. Therefore, there will be no increase in the probability or consequences of an evaluated accident. This is consistent with the qualifications required to be a manager in TS 6.3.1.

The change also deletes the title of Shift Manager. At IP3, "Shift Manager" is the NYPA specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. This requirement is redundant to 10 CFR 50.54 (m)(2)(ii) and TS section 6.2.2 requirements for an SRO and therefore removal is an administrative change with no increase in the probability or consequences of an accident.

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

No. The change allows either the Operations Manager or Assistant Operations Manager to hold the SRO license. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated since they do not affect plant configuration or plant design. The Operations Manager and the Assistant Operations Manager are still required to maintain a knowledge of IP3 plant design and operations through job position requirements.

The change also deletes the title of Shift Manager. At IP3, "Shift Manager" is the NYPA specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. This requirement is redundant to 10 CFR 50.54 (m)(2)(ii) and TS section 6.2.2 requirements and it is therefore an administrative change that can not create the possibility of a new or different accident.

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

No. The change allows either the Operations Manager or Assistant Operations Manager to hold the SRO License. The proposed amendment does not involve a significant reduction in a margin of safety because the Operations Manager and/or the Assistant Operations Manager is still required to maintain a current SRO license. Administrative Controls ensure that shift activities are directed by an individual holding an SRO license. Technical Specification 6.3.1 ensure that the Operations Manager will be a knowledgeable and qualified individual.

The change also deletes the title of Shift Manager. At IP3, "Shift Manager" is the NYPA specific title for the person meeting the requirements of 10 CFR 50.54 (m)(2)(ii) as the SRO assigned responsibility for overall plant operation. This requirement is redundant to 10 CFR 50.54 (m)(2)(ii) therefore the change has no effect on requirements and cannot offset the margin of safety.

SECTION V - IMPACT OF CHANGES

The proposed changes will not adversely affect the ALARA Program, Environmental Reports, the Security and Fire Protections Programs, or the Emergency Plan. This conclusion is based on the type of change being made in comparison to the purpose, scope and content of these programs. There are no physical changes needed to plant systems, equipment or component set points. The proposed changes also do not affect the FSAR description or the conclusions drawn in the Safety Evaluation Report.

SECTION VI - CONCLUSIONS

These TS line item administrative changes:

- a) will not significantly increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Final Safety Analysis Report;
- b) will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the Final Safety Analysis Report;
- c) will not significantly reduce the margin of safety as defined in the bases for any Technical Specification.

SECTION VII - REFERENCES

- 1. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel."
- 2. NUREG 1431 - Westinghouse Standard Technical Specifications.
- 3. IP3 FSAR

ATTACHMENT III TO IPN-00-042

**MARK-UP OF TECHNICAL SPECIFICATION
PAGES REGARDING THE PROPOSED CHANGES
TO THE ADMINISTRATIVE SECTION**

- NOTE 1: Deletions are shown in ~~strikeout~~. Additions are shown in **bold**.
- NOTE 2: Previous amendment numbers and the revision bars are not shown.

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- g) Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, auxiliary operators and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an 8 to 12 hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168 hour period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, shift turnover time can be included in the breaktime.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or his designee, or higher levels of management, in accordance with established procedures.

- h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.
- i) **The Operations Manager or the Assistant Operations Manager shall hold a Senior Reactor Operator (SRO) license.** ~~The Assistant Operations Manager and Shift Manager shall hold a Senior Reactor Operator (SRO) license. The Operations Manager shall either hold an SRO license or shall have held an SRO license at Indian Point Unit 3.~~