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October 5, 2000

Re: Indian Point Unit No. 1
Docket No. 50-3
NL-00-121

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." 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:

Changes to Sections 3.2.1.a, 3.2.1.e and 3.2.1.f to relocate administrative controls to the Quality Assurance Program Description (QAPD).

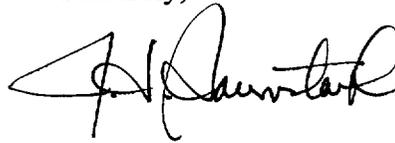
Attachment I to this letter provides the proposed changed pages, Attachment II provides the proposed changes as markups on the existing Technical Specification pages, and Attachment III provides the Safety Assessment. It has been determined that the administrative changes set forth herein do not represent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

ADDI

There are no commitments contained in this correspondence.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John F. McCann". The signature is written in a cursive style with a large, sweeping initial "J".

Attachments

cc next page

cc: Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. John L. Minns, Project Manager
Division of Reactor Program Management
US Nuclear Regulatory Commission
Mail Stop 10D-4
Washington, DC 20555

Senior Resident Inspector
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Mayor, Village of Buchanan
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Mr. William F. Valentino
President
NYS ERDA
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Albany, NY 12223-6399

Mr. Jack P. Spath
Program Director
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286 Washington Ave. Extension
Albany, NY 12223-6399

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

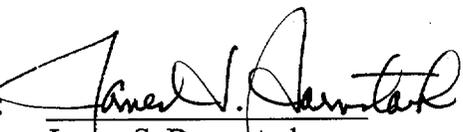
Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission ("NRC"), Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Facility Operating License No. DPR-5, hereby applies for amendment of the Technical Specifications contained in Appendix A of this license.

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

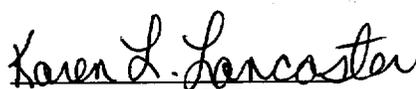
Changes to Sections 3.2.1.a, 3.2.1.e and 3.2.1.f to relocate administrative controls to the Quality Assurance Program Description (QAPD).

The specific proposed Technical Specification Revisions are set forth in Attachment I to this Application. Mark-ups 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: 
James S. Baumstark
Vice President - Nuclear Engineering

Subscribed and sworn to
before me this 5th day
October 2000.


Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified In Westchester County
Term Expires 9/30/01

~~KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified In Westchester County
Term Expires~~

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

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

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 Quality Assurance Program Description (QAPD). |
- b. The General Manager Nuclear Power Generation 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. DELETED |

- f. The review and audit functions of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) are described in the Quality Assurance Program Description (QAPD).
- g. All fuel handling shall be under the direct supervision of a licensed operator.*
- h. The Senior Watch Supervisor 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.

ATTACHMENT II

PROPOSED TECHNICAL SPECIFICATION MARKED-UP PAGES

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

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

Additions are shown by ***bold italic***,

and

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

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 **Quality Assurance Program Description (QAPD)**. ~~Updated FSAR for Indian Point Unit No. 2.~~
 - b. The General Manager Nuclear Power Generation 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.~~
 - e. **DELETED**

~~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.~~

f. The review and audit functions of the Station Nuclear Safety Committee (SNSC) and the Nuclear Facilities Safety Committee (NFSC) are described in the Quality Assurance Program Description (QAPD).

g. All fuel handling shall be under the direct supervision of a licensed operator.*

h. The Senior Watch Supervisor 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.

ATTACHMENT III

SAFETY ASSESSMENT

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

SECTION I - Description of Change

Have Section 3.2.1.a, referencing the QAPD instead of the FSAR, delete Section 3.2.1.e and have Section 3.2.1.f, refer to the QAPD for the administrative controls.

SECTION II - Evaluation of Change

NRC Generic Letter 88-06 ("Removal Of Organization Charts From Technical Specification Administrative Control Requirements") recommended that utilities relocate the bulk of their organization charts from the Technical Specifications to other, appropriately controlled documents such as the IP#2 Updated FSAR (UFSAR) or the Quality Assurance Program Description (QAPD). The organizational requirements that were considered to be safety related would remain in the Technical Specifications. Accordingly, Con Edison submitted a Technical Specification change (Reference 1) to relocate the bulk of the IP-2 organizational structure from the IP#2 Technical Specifications to the IP#2 UFSAR. This was approved by the NRC in Reference 2 wherein the NRC stated that the changes made by that amendment were in accordance with Generic Letter 88-06.

NRC Administrative Letter 95-06 recommended that utilities relocate the QA Administrative Controls from the Technical Specifications to the licensee's QA Plan which is a controlled document pursuant to 10CFR50.54(a). Accordingly, on Indian Point Unit No. 2, Con Edison submitted a Technical Specification change (References 3 and 4) to relocate the QA Administrative Controls from the Technical Specifications to the QAPD. This was approved by the NRC in Reference 5 wherein the NRC stated that the changes made by that amendment were in accordance with Administrative Letter 95-06. Therefore, in order to provide only one location for this information, this proposed IP#1 Technical Specification amendment changes the reference in Section 3.2.1.a from the IP#2 UFSAR to the QAPD.

The proposed wording of 3.2.1.f is identical to Section 6.5.1 of the IP#2 Technical Specifications which was approved by the NRC as part of Amendment 206 (Reference 5).

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

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 changes are administrative in nature. The changes involve Section 3.2.1.a, referencing the QAPD instead of the IP#2 UFSAR, deleting Section 3.2.1.e and having Section 3.2.1.f, refer to the QAPD for the administrative controls. 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 changes. 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 IP#1 FSAR or the IP#2 UFSAR design basis, accident assumptions, or IP#1 Technical Specification Bases are not affected. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

SECTION IV - Impact Of Changes

This change will not adversely impact the following:

- ALARA Program
- Security and Fire Protection Programs
- Emergency Plan
- IP#1 FSAR, IP#2 UFSAR or SER Conclusions
- Overall Plant Operations and the Environment

The changes involve Section 3.2.1.a, referencing the QAPD instead of the IP#2 UFSAR, deleting Section 3.2.1.e and having Section 3.2.1.f, refer to the QAPD for the administrative controls. For these changes, the IP#2 UFSAR is in the process of being updated. Therefore, there is no IP#1 FSAR or IP#2 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 IP#1 Technical Specifications do not involve a significant hazards consideration. In addition, the proposed changes to the IP#1 Technical Specifications have 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.

SECTION VI - References

- 1) Con Ed Letter, S. Bram to NRC DCD, dated June 15, 1988
- 2) NRC Letter, D. Langford to S. Bram, dated August 1, 1988
- 3) Con Ed Letter, A. A. Blind to NRC DCD, dated June 2, 1999
- 4) Con Ed Letter, J. S. Baumstark to NRC DCD, dated August 25, 1999
- 5) NRC Letter, J. F. Harold to A. A. Blind, dated February 25, 2000