

February 3, 1978

Docket Nos. 50-2
50-247
and 50-286

Consolidated Edison Company
of New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

Gentlemen:

The Commission has issued the enclosed Amendment No. 18 to Provisional Operating License No. DPR-5, Amendment No. 37 to Facility Operating License No. DPR-26 and Amendment No. 11 to Facility Operating License No. DPR-64 for the Indian Point Nuclear Generating Units Nos. 1, 2 and 3, respectively. These amendments consist of changes to the Technical Specifications for each license in partial response to your applications transmitted by letters dated November 2, 1977. As discussed with your staff, modifications have been made to your proposed changes to meet regulatory requirements.

These amendments revise the Technical Specifications to change requirements for administrative controls. The other changes you requested for Units 2 and 3 in your November 2, 1977 letters will be handled by separate licensing actions.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Enclosures and cc:
See next page

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OFFICE	ORB#4:DOR	ORB#4:DOR	OELD	OR	C-ORB#4:DOR
SURNAME	RIngram	PERickson:dn		JCarter	RWReid
DATE	2/2/78	2/2/78	2/2/78	2/2/78	2/3/78

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Consolidated Edison Company
of New York, Inc.

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Enclosures:

1. Amendment No. 18 to
License No. DPR-5
2. Amendment No. 37 to
License No. DPR-26
3. Amendment No. 11 to
License No. DPR-64
4. Safety Evaluation
5. Notice

cc w/enclosures: See next page

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Consolidated Edison Company
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

DOCKET NO. 50-3

INDIAN POINT NUCLEAR GENERATING UNIT NO. 1

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 18
License No. DPR-5

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) sworn to November 2, 1977, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Provisional Operating License No. DPR-5 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 18, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 3, 1978

ATTACHMENT TO LICENSE AMENDMENT NO. 18

PROVISIONAL OPERATING LICENSE NO. DPR-5

DOCKET NO. 50-3

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
3 & 4	3 & 4
7	7 - 12

Revise Appendix B as follows:

<u>Remove Page</u>	<u>Insert Page</u>
5.1-1	5.1-1

3.0 Administrative and Procedural Safeguards

3.1 Organization

3.1.1 The organization for facility management and technical support shall be as shown in Figure 3.1.

3.1.2 The Facility Organization shall be as shown in Figure 3.2. The Support Facilities Supervisor is responsible for operations at the Unit No. 1 facility.

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

3.1.4 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 Plant Manager.

3.1.5 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 practices, and radiological environmental effects.

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

3.2 Operating Instructions and Procedures

3.2.1 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.

3.2.2 Detailed written instructions setting forth procedures used in connection with the operation and maintenance of the nuclear power plant shall conform to the Technical Specifications.

3.2.3 Operation and maintenance of equipment related to safety when there is no fuel in the reactor shall be in accordance with written instructions.

3.2.6 Radiation control procedures shall be maintained and made available to all station personnel. Station operation shall adhere to these procedures. These procedures show permissible radiation exposure, and shall be consistent with the requirements of 10CFR20. The radiation protection program shall be organized to meet the requirements of 10CFR20.

* Licensed operator for IP-1 or IP-2.

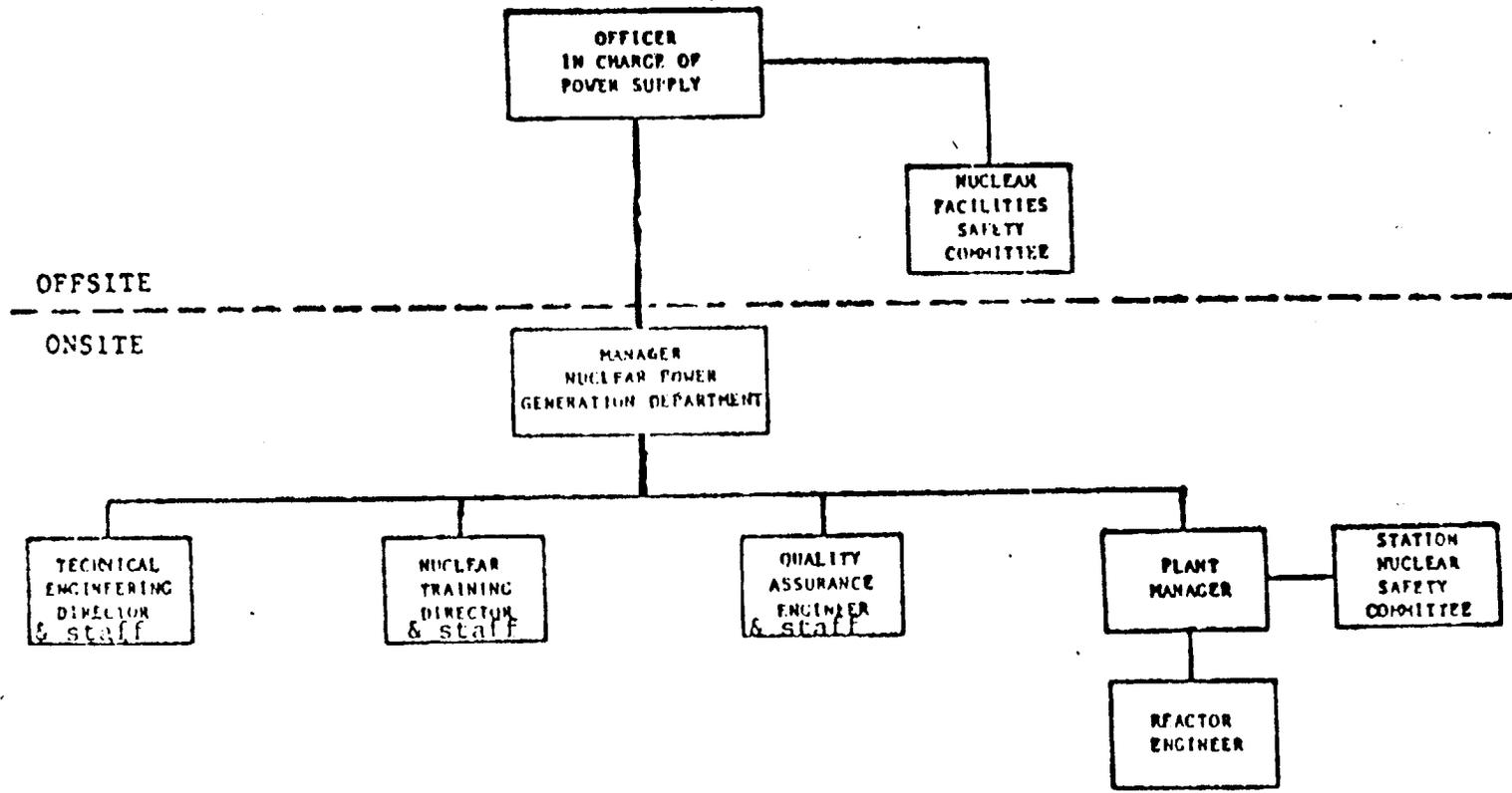


Figure 3.1 Facility Management and Technical Support Organization

6.0 PLANT REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement unless otherwise noted.

Startup Report

6.2 A summary report of plant startup and power escalation testing shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the appropriate tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

Annual Radiation Exposure Report¹

6.4 Routine reports of occupational radiation exposure data during the previous calendar year shall be submitted no later than March 1 of each year.

¹A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

6.5 The annual radiation exposure reports shall provide a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

Monthly Operating Report

6.6 Routine reports of operating experience and safety-related maintenance and modifications shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, with 40 copies to the Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, no later than 15 days following the calendar month covered by the report.

6.7 Each monthly operating report shall include:

- a. A tabulation of plant operating data and statistics.
- b. A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in 6.7.c.5 below.³
- c. For each outage or forced reduction in power⁴ of over twenty percent rated power where the reduction extends for greater than four hours:
 1. The proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction);

²This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

³Any safety-related maintenance information not available for inclusion in the monthly operating report for a report period shall be included in a subsequent monthly operating report not later than 6 months following completion of such maintenance.

⁴The term "forced reduction in power" is defined as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

2. A brief discussion of (or reference to reports of) any reportable occurrences pertaining to the outage or power reduction;
3. Corrective action taken to reduce the probability of recurrence, if appropriate;
4. Operating time lost as a result of the outage or power reduction (for scheduled or forced outages,⁵ use the generator off-line hours; for forced reductions in power, use the approximate duration of operation at reduced power);
5. A description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and
6. A report of any single release of radioactivity or radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

Reportable Occurrences

6.8 The reportable occurrences of specifications 6.8.1 and 6.8.2 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

⁵The term "forced outage" is defined as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

Prompt Notification with Written Followup Report

6.8.1 The types of events listed below shall be reported within 24 hours of identification by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Region I Office of Inspection and Enforcement or his designate, no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the technical specifications or failure to complete the required protective function.
- b. Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
- c. Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.⁶
- d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if subcritical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or occurrence of any unplanned criticality.

⁶Leakage of packing, gaskets, mechanical joints or seal welds within the limits for identified leakage set forth in technical specifications need not be reported under this item.

- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR.
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR.
- g. Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the safety analysis report or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- i. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases; or discovery during plant life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Thirty Day Written Reports

6.8.2 The types of events listed below shall be the subject of written reports to the Director of the Region I Office of Inspection and Enforcement within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.⁷
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.⁷
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.8.1.c above designed to contain radioactive material resulting from the fission process.⁸

6.9 Any references to the term "Safety Analysis Report", "SAR" or "FSAR" for Indian Point Station, Unit No. 1, shall be deemed to refer, as appropriate, to the following exhibits which are a part of the application: F-4 (Rev.-3), F-6 (Rev.-2), F-7 (Rev.-1), G-3 (Rev.-2), H-14 (Rev.-2), K-4, K-4A, K-4B, K-5 (Rev.-1, but not including Sections 2.1.2 through 2.3.7.4, Section 4, Figures 2-1 through 2-9, Figure 3-17, Figures 4-1 through 4-12, and Appendix A), K-5A1, K-5A10, K-5A11, K-5A11A, K-5A12, K-5A13, K-5A14, as amended, K-5A15, K-16, and the document entitled "Final Hazards Summary Report for the Consolidated Edison Indian Point Reactor Core B", as amended.

⁷Routine surveillance testing, instrument calibration, or preventive maintenance which require system configurations as described need not be reported except where test results themselves reveal a degraded mode as described.

⁸Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limits for identified leakage set forth in technical specifications need not be reported under this item.

5.0 ADMINISTRATIVE CONTROLS

Objective

To establish the administrative controls that relate to management procedures, recordkeeping and reporting that are considered necessary to provide the assurance and evidence that the plant will be managed as prescribed by the Environmental Technical Specifications and will be operated to provide continuing protection of the environment.

Specifications

5.1 Organization, Responsibilities, Review and Audits

5.1.1 Organization and Responsibilities

5.1.1.1 The ultimate responsibility for the implementation of the Environmental Technical Specifications shall reside with the corporate officers of Consolidated Edison Company of New York, Inc. The corporate and Station level organization chart is shown in Figure 5.1-1.

5.1.1.2 The Plant Manager shall have direct responsibility for the safe operation and maintenance of all facilities comprising Indian Point Station and to assure that the limiting conditions of operation as noted in the Environmental Technical Specifications as defined herein are not exceeded. This responsibility shall be expressly delegated to a specified member of the Station management staff during any off-duty status period of the Plant Manager. The Chief Operations Engineer, who shall report to the Plant Manager, shall have direct responsibility for the safe operation of all nuclear Units at the Station. The Operations Engineer, who shall report to the Chief Operations Engineer, shall have direct responsibility for the safe operation of his assigned nuclear Unit. The Plant Manager shall report to the Manager of the Nuclear Power Generation Department who reports to the Senior Vice President of Power Supply, who is in charge of all of its generating facilities. See Section 6.1 of Appendix A, Technical Specifications for a detailed description of responsibility of the licensee's facilities.

5.1.1.3 The Senior Engineer, Environmental, Nuclear and Gas Testing Group, shall report via the Division Engineer, Chief Chemical Engineer, and Manager, Operations Services, to the Assistant Vice President, Power Generation Operations and either he, or his designee, has primary responsibility for the conduct of the nuclear environmental monitoring program and long term or life-of-the-plant type environmental monitoring programs. The Chief Nuclear and Emissions Control Engineer, who shall report to the Assistant Vice President, Engineering, and the Director of the Biology Department, who shall report to the Vice President, Environmental Affairs of the Company, have primary responsibility for execution of environmental surveillance studies.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20585

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 37
License No. DPR-26

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of New York, Inc. (the licensee) sworn to November 2, 1977, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR- 26 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 37, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 3, 1978

ATTACHMENT TO LICENSE AMENDMENT NO. 37

FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
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iv	iv
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Revise Appendix B as follows:

<u>Remove Page</u>	<u>Insert Page</u>
5.1-1	5.1-1

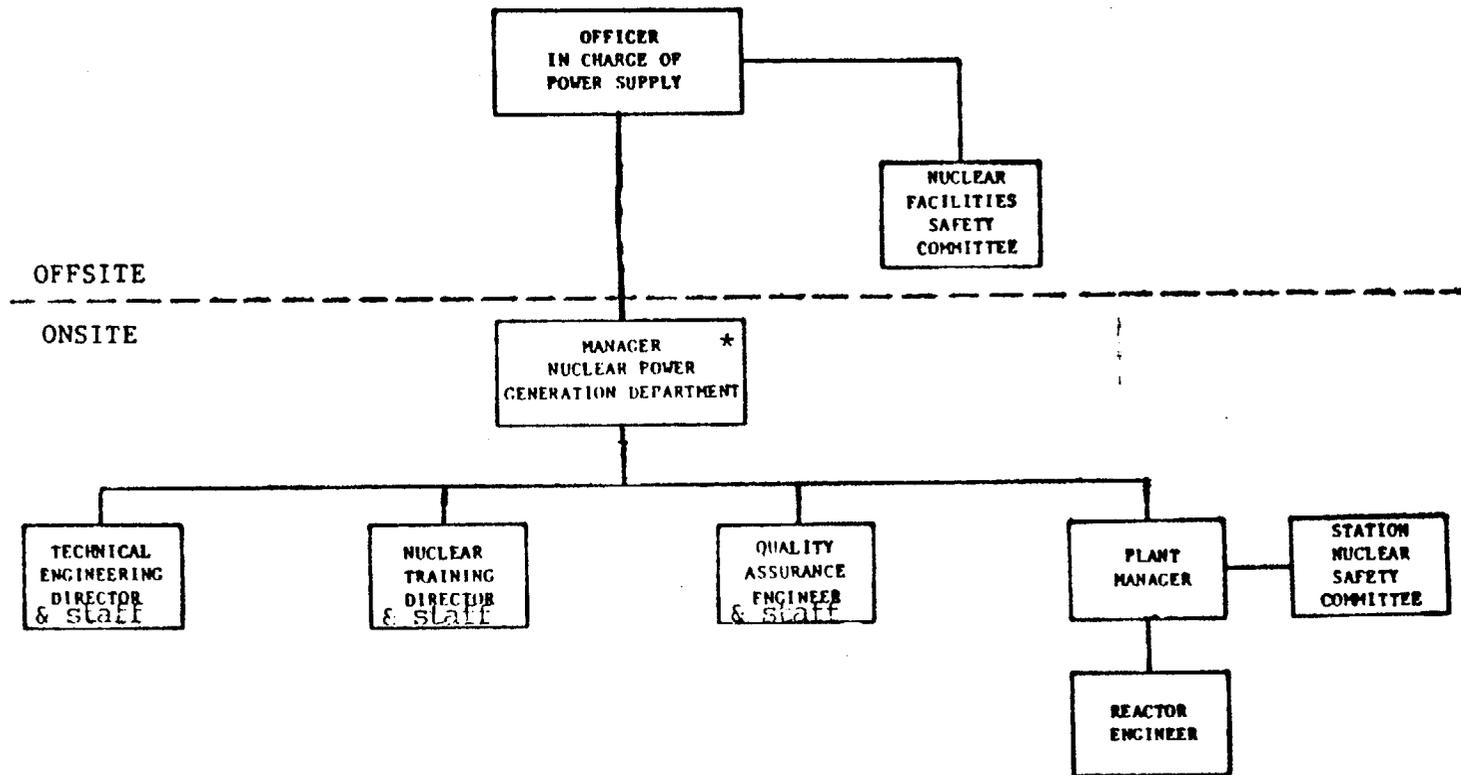
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* Responsible for performance and monitoring of the Fire Protection Program

Figure 6.2-1 Facility Management and Technical Support Organization

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

6.5 REVIEW AND AUDIT

6.5.1 STATION NUCLEAR SAFETY COMMITTEE (SNSC)

FUNCTION

6.5.1.1 The Station Nuclear Safety Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

6.5.1.2 The Station Nuclear Safety Committee shall be composed as follows:

Chairman:	Plant Manager
Member:	Technical Engineering Director
Member:	Quality Assurance Engineer
Member:	Chief Operations Engineer
Member:	Security Supervisor
Member:	Test and Performance Engineer
Member:	Instrument and Control Engineer
Member:	Maintenance Engineer
Member:	Chemistry and Radiation Safety Director
Member:	Reactor Engineer
Member:	Manager NPG
Member:	Refueling Engineer

ALTERNATES

6.5.1.3 Alternate members shall be appointed in writing by the SNSC Chairman to serve on a temporary basis.

MEETING FREQUENCY

6.5.1.4 The SNSC shall meet at least once per calendar month and as convened by the SNSC Chairman.

6.5.1.5 A quorum of the SNSC shall consist of the Chairman or Vice Chairman and five members including no more than two alternates.

RESPONSIBILITIES

- 6.5.1.6 The Station Nuclear Safety Committee shall be responsible for:
- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, and 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications and preparation and forwarding of a report covering evaluation and recommendations to prevent recurrence to the Manager, Nuclear Power Generation Department and to the Chairman of the Nuclear Facilities Safety Committee.
 - f. Review of facility operations to detect potential safety hazards.
 - g. Performance of special reviews and investigations and the issuance of reports thereon as requested by the Chairman of the Nuclear Facilities Safety Committee.
 - h. Review of the Plant Security Plan and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.
 - i. Review of the Emergency Plan and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.

AUTHORITY

- 6.5.1.7 The Station Nuclear Safety Committee shall:
- a. Recommend to the Plant Manager, in writing, approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
 - b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.

AUTHORITY (Continued)

- c. Provide immediate written notification to the Chairman, Nuclear Facilities Safety Committee and the Manager, Nuclear Power Generation Department of disagreement between the recommendations of the SNSC and the actions contemplated by the Plant Manager. However, the course of action determined by the Plant Manager pursuant to 6.1.1 above shall be followed. -

RECORDS

6.5.1.8 The Station Nuclear Safety Committee shall maintain written minutes of each meeting and copies shall be provided to, as a minimum, the Manager, Nuclear Power Generation Department and the Chairman, Nuclear Facilities Safety Committee.

6.5.2 NUCLEAR FACILITIES SAFETY COMMITTEE (NFSC)

FUNCTION

6.5.2.1 The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. reactor operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy and non-destructive testing
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. administrative controls and quality assurance practices
- i. radiological environmental effects
- j. other appropriate fields associated with the unique characteristics of the nuclear power plant

COMPOSITION

6.5.2.2 The Committee shall have a permanent voting membership of at least 5 persons of which a majority are independent of the Nuclear Power Generation Department and shall include technically competent persons from departments of Consolidated Edison having a direct interest in nuclear plant design, construction, operation or in nuclear safety. In addition, persons from departments not having a direct interest in nuclear plant design, construction, operation or nuclear safety may serve as members of the Committee if experienced in the field of nuclear energy. The Chairman and Vice Chairman will be Senior Officials of the Company experienced in the field of nuclear energy.

The Chairman of the Nuclear Facilities Safety Committee, hereafter referred to as the Chairman, shall be appointed by the Chairman of the Board or the President of the Company.

The Vice Chairman shall be appointed by the Chairman of the Board or the President of the Company. In the absence of the Chairman, he will serve as Chairman.

The Secretary shall be appointed by the Chairman of the Committee.

Committee members from departments having a direct interest in nuclear plant design, construction and operation or in nuclear safety shall be designated by the Vice President of the Company who is responsible for the functioning of the department subject to the approval of the Chairman. Committee members from other departments may be appointed by the Chairman with the concurrence of the Vice President of that department.

ALTERNATES

6.5.2.3 Each permanent voting member, subject to the Chairman's approval, may appoint an alternate to serve in his absence. Committee records shall be maintained showing each such current designation.

No more than two alternates shall participate in activities at any one time.

Alternate members shall have voting rights.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NFSC Chairman.

MEETING FREQUENCY

6.5.2.5 The NFSC shall meet at least once per calendar quarter or at more frequent intervals at the call of the Chairman or, in his absence, the Vice Chairman.

QUORUM

6.5.2.6 A majority of the permanent voting committee members, or duly appointed alternates, which shall include the Chairman or the Vice Chairman and of which a minority are from the Nuclear Power Generation Department shall constitute a quorum for meetings of the committee. In the event both the Chairman and the Vice Chairman are absent, one of the permanent voting members will serve as Acting Chairman.

REVIEW

6.5.2.7 The following subjects shall be reported to and reviewed by the Committee insofar as they relate to matters of nuclear safety:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.

REVIEW (Continued)

- g. Reportable Occurrences, as specified in Specifications 6.9.1.7.1 and 6.9.1.7.2.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Station Nuclear Safety Committee.
- j. Environmental surveillance program pertaining to radiological matters.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NFSC. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Radiological Technical Specifications (Appendix A) and applicable license conditions at least once per 12 months.
- b. The conformance to all provisions contained within the Environmental Technical Specifications (Appendix B) pertaining to radiological matters and applicable license conditions at least once per 12 months.
- c. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- d. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- e. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- f. The Facility Emergency Plan and implementing procedures at least once per 24 months.
- g. The Facility Security Plan and implementing procedures at least once per 24 months.

- h. The Facility Fire Protection Program and implementation procedures at least once per 24 months.
- i. A fire protection and loss prevention inspection and audit shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm at least once per 12 months.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at least once per 36 months.
- k. The environmental surveillance program pertaining to radiological matters and implementing procedures at least once per 12 months.
- l. Any other area of facility operation considered appropriate by the NFSC or the Senior Company Officer in charge of Power Supply.

AUTHORITY

6.5.2.9 The NFSC shall report to and advise the Senior Company Officer in charge of Power Supply on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of NFSC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NFSC meeting shall be prepared, approved and forwarded to the Senior Company Officer in charge of Power Supply within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 e, f, g and h above, shall be prepared, approved and forwarded to the Senior Company Officer in charge of Power Supply within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Company Officer in charge of Power Supply and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE VIOLATION

6.6.1 The following actions shall be taken in the event of a Reportable Occurrence:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specifications 6.9.1.7.1 and/or 6.9.1.7.2.
- b. Each Reportable Occurrence Report submitted to the Commission shall be reviewed by the SNSC and submitted to the NFSC Chairman, and the Manager, Nuclear Power Generation Department.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit Violation shall be reported to the Commission, the Manager, Nuclear Power Generation Department and to the NFSC Chairman immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NFSC Chairman and the Manager, Nuclear Power Generation Department within 10 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USAEC Regulatory Guide 1.33 (issued November 1972) except as provided in 6.8.2 and 6.8.3 below.

6.8.2 Each procedure and administrative policy of 6.8.1 above and any changes to them shall be reviewed and approved for implementation in accordance with a written administrative control procedure approved by the Manager, Nuclear Power Generation Department, with the concurrence of the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee. The administrative control procedure required by this specification shall, as a minimum, require that:

- a. Each proposed procedure/procedure change involving safety related components and/or operation of same receives a pre-implementation review by the SNSC except in case of an emergency.
- b. Each proposed procedure/procedure change which renders or may render the Final Safety Analysis Report or subsequent safety analysis reports inaccurate and those which involve or may involve potential unreviewed safety questions are approved by the SNSC prior to implementation.
- c. The approval of the Nuclear Facilities Safety Committee shall be sought if, following its review, the Station Nuclear Safety Committee finds that the proposed procedure/procedure change either involves an unreviewed safety question or if it is in doubt as to whether or not an unreviewed safety question is involved.

6.8.3 A mechanism shall exist for making temporary changes and they shall only be made by approved management personnel in accordance with the requirements of ANSI 18.7-1972. The change shall be documented, and reviewed by the SNSC within 7 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement unless otherwise noted.

Startup Report

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the appropriate tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

Annual Radiation Exposure Report¹

6.9.1.3 Routine reports of occupational radiation exposure data during the previous calendar year shall be submitted no later than March 1 of each year.

6.9.1.4 The annual radiation exposure reports shall provide a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter,

¹A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

²This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

Monthly Operating Report

6.9.1.5 Routine reports of operating statistics, operating and shutdown experience and safety-related maintenance shall be submitted on a monthly basis to the Director, Office of Management Information & Program Control, with 40 copies to the Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, no later than 15 days following the calendar month covered by the report.

6.9.1.6 Each monthly operating report shall include:

- a. A tabulation of plant operating data and statistics.
- b. A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in 6.9.1.6.c.5 below.³
- c. For each outage or forced reduction in power⁴ of over twenty percent of rated power where the reduction extends for greater than four hours:
 1. The proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction);
 2. A brief discussion of (or reference to reports of) any reportable occurrences pertaining to the outage or power reduction;
 3. Corrective action taken to reduce the probability of recurrence, if appropriate;
 4. Operating time lost as a result of the outage or power reduction (for scheduled or forced outages,⁵ use the generator off-line

³Any safety-related maintenance information not available for inclusion in the monthly operating report for a report period shall be included in a subsequent monthly operating report not later than 6 months following completion of such maintenance.

⁴The term "forced reduction in power" is defined as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

⁵The term "forced outage" is defined as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

hours; for forced reductions in power, use the approximate duration of operation at reduced power);

5. A description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and
6. A report of any single release of radioactivity or radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

Reportable Occurrences

6.9.1.7 The reportable occurrences of specifications 6.9.17.1 and 6.9.17.2 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

Prompt Notification with Written Followup Report

6.9.1.7.1 The types of events listed below shall be reported within 24 hours of identification by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Region I Office of Inspection and Enforcement, or his designate, no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint

- specified as the limiting safety system setting in the technical specifications or failure to complete the required protective function.
- b. Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
 - c. Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.⁶
 - d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if subcritical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or occurrence of any unplanned criticality.
 - e. Failure of malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the FSAR.
 - f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the FSAR.
 - g. Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
 - h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the FSAR or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.

⁶Leakage of packing, gaskets, mechanical joints or seal welds within the limits for identified leakage set forth in technical specifications need not be reported under this item. Steam generator tube degradation need not be reported under this item except where leakage exceeds the limits of specification 3.1.F.

1. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the FSAR or technical specifications bases; or discovery during plant life of conditions not specifically considered in the safety analysis report or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Thirty Day Written Reports

6.9.1.7.2 The types of events listed below shall be the subject of written reports to the Director of the Region I Office of Inspection and Enforcement within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.⁷
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.⁷
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.7.1.c above designed to contain radioactive material resulting from the fission process.⁸

⁷Routine surveillance testing, instrument calibration, or preventive maintenance which require system configurations as described need not be reported except where test results themselves reveal a degraded mode as described.

⁸Sealed sources or calibration sources are not included under this item. Leakage of packing, gaskets, mechanical joints or seal welds within the limits for identified leakage set forth in technical specifications need not be reported under this item.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Each containment integrated leak rate test shall be the subject of a summary technical report including results of the local leak rate test since the last report. The report shall include analyses and interpretations of the results which demonstrate compliance in meeting the leak rate limits specified in the Technical Specifications.
- b. A report covering the X-Y xenon stability tests within three months upon completion of the tests.
- c. To provide the Commission with added verifications of the safety and reliability of the pre-pressurized Zircaloy-clad nuclear fuel, a limited program of non-destructive fuel inspections will be conducted. The program shall consist of a visual inspection (e.g., underwater TV, periscope, or other) of the two lead burnup assemblies in each region during the first, second, and third refueling shutdowns. Any condition observed by this inspection which would lead to unacceptable fuel performance may be the object of an expanded surveillance effort. If another domestic plant which contains pre-pressurized fuel of a similar design reaches fuel exposures equal to or greater than at Indian Point Unit No. 2, and if a limited inspection program is or has been performed there, then the program may not have to be performed at Indian Point Unit No. 2. However, such action requires approval of the Nuclear Regulatory Commission. The results of these inspections will be reported to the Nuclear Regulatory Commission.
- d. Inoperable fire protection and detection equipment (Specification 3.13).

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. Reportable Occurrence Reports.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to Operating Procedures.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.

RECORD RETENTION (Continued)

- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the SNSC and the NFSC.

6.11 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.

6.12 HIGH RADIATION AREA

6.12.1 As an acceptable alternate to the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

- 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 6.12.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Watch Supervisor on duty.

5.0 ADMINISTRATIVE CONTROLS

Objective

To establish the administrative controls that relate to management procedures, recordkeeping and reporting that are considered necessary to provide the assurance and evidence that the plant will be managed as prescribed by the Environmental Technical Specifications and will be operated to provide continuing protection of the environment.

Specifications

5.1 Organization, Responsibilities, Review and Audits

5.1.1 Organization and Responsibilities

5.1.1.1 The ultimate responsibility for the implementation of the Environmental Technical Specifications shall reside with the corporate officers of Consolidated Edison Company of New York, Inc. The corporate and Station level organization chart is shown in Figure 5.1-1.

5.1.1.2 The Plant Manager shall have direct responsibility for the safe operation and maintenance of all facilities comprising Indian Point Station and to assure that the limiting conditions of operation as noted in the Environmental Technical Specifications as defined herein are not exceeded. This responsibility shall be expressly delegated to a specified member of the Station management staff during any off-duty status period of the Plant Manager. The Chief Operations Engineer, who shall report to the Plant Manager, shall have direct responsibility for the safe operation of all nuclear Units at the Station. The Operations Engineer, who shall report to the Chief Operations Engineer, shall have direct responsibility for the safe operation of his assigned nuclear Unit. The Plant Manager shall report to the Manager of the Nuclear Power Generation Department who reports to the Senior Vice President of Power Supply, who is in charge of all of its generating facilities. See Section 6.1 of Appendix A, Technical Specifications for a detailed description of responsibility of the licensee's facilities.

5.1.1.3 The Senior Engineer, Environmental, Nuclear and Gas Testing Group, shall report via the Division Engineer, Chief Chemical Engineer, and Manager, Operations Services, to the Assistant Vice President, Power Generation Operations and either he, or his designee, has primary responsibility for the conduct of the nuclear environmental monitoring program and long term or life-of-the-plant type environmental monitoring programs. The Chief Nuclear and Emissions Control Engineer, who shall report to the Assistant Vice President, Engineering, and the Director of the Biology Department, who shall report to the Vice President, Environmental Affairs of the Company, have primary responsibility for execution of environmental surveillance studies.



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

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

POWER AUTHORITY OF THE STATE OF NEW YORK

DOCKET NO. 50-286

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 11
License No. DPR-64

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consolidated Edison Company of New York, Inc. and the Power Authority of the State of New York (the licensees) sworn to November 2, 1977, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

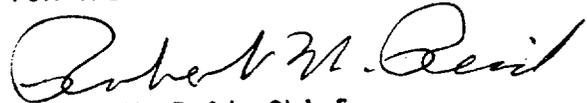
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-64 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 11, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 3, 1978

ATTACHMENT TO LICENSE AMENDMENT NO. 11

FACILITY OPERATING LICENSE NO. DPR-64

DOCKET NO. 50-286

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
iii	iii
iv	iv
6-2	6-2
6-5 & 6-6	6-5 & 6-6
6-8 - 6-24	6-8 - 6-22

Revise Appendix B as follows:

<u>Remove Page</u>	<u>Insert Page</u>
5.1-1	5.1-1

Changes on the revised pages are shown by marginal lines.

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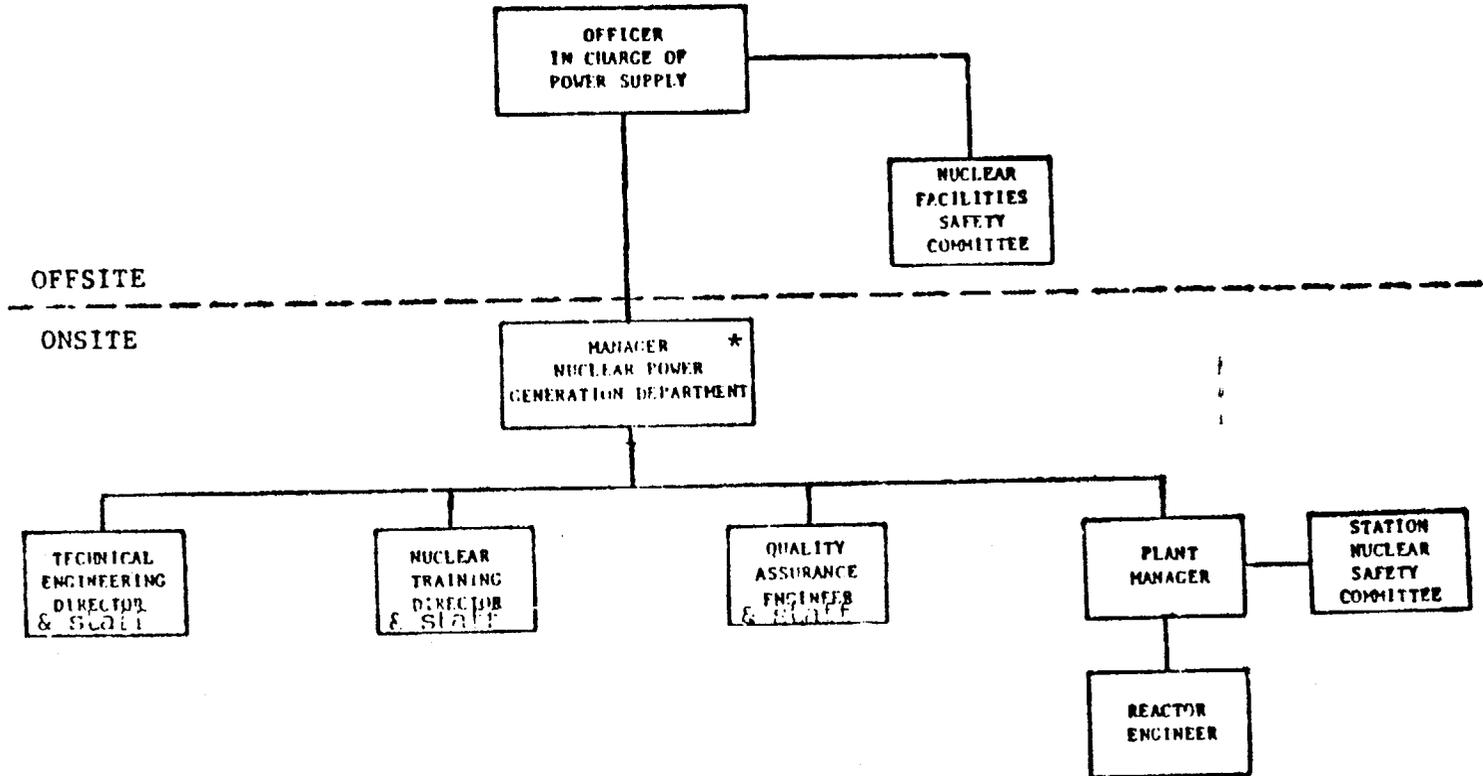
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* Responsible for performance and monitoring of the Fire Protection Program

Figure 6.2-1 Facility Management and Technical Support Organization

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Training Director and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

6.5 REVIEW AND AUDIT

6.5.1 STATION NUCLEAR SAFETY COMMITTEE (SNSC)

FUNCTION

6.5.1.1 The Station Nuclear Safety Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

6.5.1.2 The Station Nuclear Safety Committee shall be composed as follows:

Chairman:	Plant Manager
Member:	Technical Engineering Director
Member:	Quality Assurance Engineer
Member:	Chief Operations Engineer
Member:	Security Supervisor
Member:	Test and Performance Engineer
Member:	Instrument and Control Engineer
Member:	Maintenance Engineer
Member:	Chemistry and Radiation Safety Director
Member:	Reactor Engineer
Member:	Manager NPG
Member:	Refueling Engineer

ALTERNATES

6.5.1.3 Alternate members shall be appointed in writing by the SNSC Chairman to serve on a temporary basis.

Meeting Frequency

6.5.1.4 The SNSC shall meet at least once per calendar month and as convened by the SNSC Chairman.

Quorum

6.5.1.5 A quorum of the SNSC shall consist of the Chairman or Vice Chairman and five members including no more than two alternates.

Responsibilities

6.5.1.6 The Station Nuclear Safety Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, and 2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and preparation and forwarding of a report covering evaluation and recommendations to prevent recurrence to the Manager, Nuclear Power Generation Department and to the Chairman of the Nuclear Facilities Safety Committee.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and the issuance of reports thereon as requested by the Chairman of the Nuclear Facilities Safety Committee.

6.5.2

Nuclear Facilities Safety Committee (NFSC)

Function

6.5.2.1 The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. reactor operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy and non-destructive testing
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. administrative controls and quality assurance practices
- i. radiological environmental effects
- j. other appropriate fields associated with the unique characteristics of the nuclear power plant

Composition

6.5.2.2 The Committee shall have a permanent voting membership of at least 5 persons of which a majority are independent of the Nuclear Power Generation Department and shall include technically competent persons from departments of Consolidated Edison having a direct interest in nuclear plant design, construction, operation or in nuclear safety. In addition, persons from departments not having a direct interest in nuclear plant design, construction, operation or nuclear safety may serve as members of the Committee if experienced in the field of nuclear energy. The Chairman and Vice Chairman will be Senior Officials of the Company experienced in the field of nuclear energy.

The Chairman of the Nuclear Facilities Safety Committee, hereafter referred to as the Chairman, shall be appointed by the Chairman of the Board or the President of the Company.

The Vice Chairman shall be appointed by the Chairman of the Board or the President of the Company. In the absence of the Chairman, he will serve as Chairman.

The Secretary shall be appointed by the Chairman of the Committee.

Committee members from departments having a direct interest in nuclear plant design, construction and operation or in nuclear safety shall be designated by the Vice President of the Company who is responsible for the functioning of the department subject to the approval of the Chairman. Committee members from other departments may be appointed by the Chairman with the concurrence of the Vice President of that department.

Alternates

6.5.2.3 Each permanent voting member, subject to the Chairman's approval, may appoint an alternate to serve in his absence. Committee records shall be maintained showing each such designation.

No more than two alternates shall participate in activities at any one time.

Alternate members shall have voting rights.

Consultants

6.5.2.4 Consultants shall be utilized as determined by the NFSC Chairman.

Meeting Frequency

6.5.2.5 The NFSC shall meet at least once per calendar quarter or at more frequent intervals at the call of the Chairman or, in his absence, the Vice Chairman.

Quorum

6.5.2.6 A majority of the permanent voting committee members, or duly appointed alternates, which shall include the Chairman or the Vice Chairman and of which a minority are from the Nuclear Power Generation Department shall constitute a quorum for meetings of the committee. In the event both the Chairman and the Vice Chairman are absent, one of the permanent voting members will serve as Acting Chairman.

Review

6.5.2.7 The following subjects shall be reported to and reviewed by the Committee insofar as they relate to matters of nuclear safety:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or Licenses.

- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. REPORTABLE OCCURRENCES, as specified in specifications 6.9.1.7.1 and 6.9.1.7.2.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Station Nuclear Safety Committee.
- j. Environmental surveillance program pertaining to radiological matters.

Audits

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the NFSC. These audits shall encompass:

- a. The conformance of facility operation to all provisions contained within the Radiological Technical Specifications (Appendix A) and applicable license conditions at least once per 12 months.
- b. The conformance to all provisions contained within the Environmental Technical Specifications (Appendix B) pertaining to radiological matters and applicable license conditions at least once per 12 months.
- c. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- d. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- e. The performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.
- f. The Facility Emergency Plan and implementing procedures at least once per 24 months.

- g. The Facility Security Plan and implementing procedures at least once per 24 months.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. A fire protection and loss prevention inspection and audit shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm at least once per 12 months.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at least once per 36 months.
- k. The environmental surveillance program pertaining to radiological matters and implementing procedures at least once per 12 months.
- l. Any other area of facility operation considered appropriate by the NFSC or the Senior Company Officer in charge of Power Supply.

Authority

6.5.2.9 The NFSC shall report to and advise the Senior Company Officer in charge of Power Supply on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

Records

6.5.2.10 Records of NFSC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NFSC meeting shall be prepared, approved and forwarded to the Senior Company Officer in charge of Power Supply within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 e, f, g and h, above, shall be prepared, approved and forwarded to the Senior Company Officer in charge of Power Supply within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8, above, shall be forwarded to the Senior Company Officer in charge of Power Supply and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken in the event of a REPORTABLE OCCURRENCE:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of specifications 6.9.1.7.1 and/or 6.9.1.7.2.
- b. Each Reportable Occurrence Report submitted to the Commission shall be reviewed by the SNSC and submitted to the NFSC Chairman, and the Manager, Nuclear Power Generation Department.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Commission, the Manager, Nuclear Power Generation Department and to the NFSC Chairman immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SNSC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NFSC Chairman and the Manager, Nuclear Power Generation Department within 10 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of Regulatory Guide 1.33 (November 1972) except as provided in 6.8.2 and 6.8.3, below.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and any changes to them shall be reviewed and approved for implementation in accordance with a written administrative control procedure approved by the Manager,

Nuclear Power Generation Department, with the concurrence of the Station Nuclear Safety Committee and the Nuclear Facilities Safety Committee. The administrative control procedure required by this specification shall, as a minimum, require that:

- a. Each proposed procedure/procedure change involving safety related components and/or operation of same receives a pre-implementation review by the SNSC except in case of an emergency.
- b. Each proposed procedure/procedure change which renders or may render the Final Safety Analysis Report or subsequent safety analysis reports inaccurate and those which involve or may involve potential unreviewed safety questions are approved by the SNSC prior to implementation.
- c. The approval of the Nuclear Facilities Safety Committee shall be sought if, following its review, the Station Nuclear Safety Committee finds that the proposed procedure/procedure change either involves an unreviewed safety question or if it is in doubt as to whether or not an unreviewed safety question is involved.

6.8.3 A mechanism shall exist for making temporary changes, and they shall only be made by approved management personnel in accordance with the requirements of ANSI 18.7-1972. The change shall be documented, and reviewed by the SNSC within 7 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement unless otherwise noted.

Startup Report

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following, (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The report shall address each of the appropriate tests

identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

Annual Radiation Exposure Report¹

6.9.1.3 Routine reports of occupational radiation exposure data during the previous calendar year shall be submitted no later than March 1 of each year.

6.9.1.4 The annual radiation exposure reports shall provide a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

Monthly Operating Report

6.9.1.5 Routine reports of operating statistics, operating and shutdown experience and safety-related maintenance shall be submitted on a monthly basis to the Director, Office of Management Information & Program Control, with 40 copies to the Office of Inspection and Enforcement, U.S.

¹A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

²This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

Nuclear Regulatory Commission, Washington, D.C. 20555, no later than 15 days following the calendar month covered by the report.

6.9.1.6 Each monthly operating report shall include:

- a. A tabulation of plant operating data and statistics.
- b. A narrative summary of operating experience during the report period relating to safe operation of the facility, including safety-related maintenance not covered in 6.9.1.6.c.5 below.³
- c. For each outage or forced reduction in power⁴ of over twenty percent of RATED POWER where the reduction extends for greater than four hours:
 1. The proximate cause and the system and major component involved (if the outage or forced reduction in power involved equipment malfunction);
 2. A brief discussion of (or reference to reports of) any reportable occurrences pertaining to the outage or power reduction;
 3. Corrective action taken to reduce the probability of recurrence, if appropriate;
 4. Operating time lost as a result of the outage or power reduction (for scheduled or forced outages,⁵ use the generator off-line hours; for forced reductions in power, use the approximate duration of operation at reduced power);
 5. A description of major safety-related corrective maintenance performed during the outage or power reduction, including the system and component involved and identification of the critical path activity dictating the length of the outage or power reduction; and
 6. A report of any single release of radioactivity or radiation exposure specifically associated with the outage which accounts for more than 10% of the allowable annual values.

³Any safety-related maintenance information not available for inclusion in the monthly operating report for a report period shall be included in a subsequent monthly operating report not later than 6 months following completion of such maintenance.

⁴The term "forced reduction in power" is defined as the occurrence of a component failure or other condition which requires that the load on the unit be reduced for corrective action immediately or up to and including the very next weekend. Note that routine preventive maintenance, surveillance and calibration activities requiring power reductions are not covered by this section.

⁵The term "forced outage" is defined as the occurrence of a component failure or other condition which requires that the unit be removed from service for corrective action immediately or up to and including the very next weekend.

Reportable Occurrences

6.9.1.7 The REPORTABLE OCCURRENCES of specifications 6.9.1.7.1 and 6.9.1.7.2 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

Prompt Notification with Written Followup Report

6.9.1.7.1 The types of events listed below shall be reported within 24 hours of identification by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the Director of the Region I Office of Inspection and Enforcement, or his designate, no later than the first working day following the event, with a written followup report within two weeks. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Failure of the reactor protection system or other systems subject to limiting safety system settings to initiate the required protective function by the time a monitored parameter reaches the setpoint specified as the limiting safety system setting in the technical specifications or failure to complete the required protective function.
- b. Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the technical specifications.
- c. Abnormal degradation discovered in fuel cladding, reactor coolant pressure boundary, or primary containment.⁶

⁶Leakage of packing, gaskets, mechanical joints and seal welds within the limits for identified leakage set forth in technical specifications need not be reported under this item. Steam generator tube degradation need not be reported under this item except where leakage exceeds the limits of specification 3.1.F.

- d. Reactivity anomalies involving disagreement with the predicted value of reactivity balance under steady state conditions during power operation greater than or equal to 1% $\Delta k/k$; a calculated reactivity balance indicating a shutdown margin less conservative than specified in the technical specifications; short-term reactivity increases that correspond to a reactor period of less than 5 seconds or, if sub-critical, an unplanned reactivity insertion of more than 0.5% $\Delta k/k$; or occurrence of any unplanned criticality.
- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the FSAR.
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the FSAR.
- g. Conditions arising from natural or man-made events that, as a direct result of the event require plant shutdown, operation of safety systems, or other protective measures required by technical specifications.
- h. Errors discovered in the transient or accident analyses or in the methods used for such analyses as described in the FSAR or in the bases for the technical specifications that have or could have permitted reactor operation in a manner less conservative than assumed in the analyses.
- i. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or technical specifications bases; or discovery during plant life of conditions not specifically considered in the FSAR or technical specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

Thirty Day Written Reports

6.9.1.7.2 The types of events listed below shall be the subject of written reports to the Director of the Region I Office of Inspection and Enforcement

within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.⁷
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.⁷
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.7.1.c above designed to contain radioactive material resulting from the fission process.⁸

Special Reports

6.9.2 Special reports shall be submitted to the Director of the Region I Office of Inspection and Enforcement, within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. A special report will be prepared covering performance of the Low Pressure Steam Dump System during tests performed at a power level higher than 85% of the license application rating. Test results will

⁷Routine surveillance testing, instrument calibration, or preventive maintenance which require system configurations as described need not be reported except where test results themselves reveal a degraded mode as described.

⁸Sealed sources or calibration sources are not included under this item. Leakage of packing, gaskets, mechanical joints and seal welds within the limits for identified leakage set forth in technical specifications need not be reported under this item.

be extrapolated to verify performance at the design conditions for the license application rating (3025 MWt). The report will be submitted within 90 days of completion of the test.

- b. Sealed source leakage on excess of limits (Specification 3.9)
- c. Inoperable seismic monitoring instrumentation (Specification 4.10)
- d. Seismic event analysis (Specification 4.10)
- e. Primary coolant activity in excess of limits (Specification 3.1.D)
- f. Inoperable fire protection and detection equipment (Specification 3.14).

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. REPORTABLE OCCURRENCE REPORTS
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of reactor tests and experiments.
- f. Records of changes made to Operating Procedures.
- g. Records of radioactive shipments.
- h. Records of sealed source leak tests and results.
- i. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the SNSC and the NFSC.

6.11 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.

6.12 HIGH RADIATION AREA

6.12.1 As an acceptable alternate to the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

- 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 6.12.1(a), above, and in addition locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Watch Supervisor on duty.

5.0 ADMINISTRATIVE CONTROLS

Objective

To establish the administrative controls that relate to management procedures, recordkeeping and reporting that are considered necessary to provide the assurance and evidence that the plant will be managed as prescribed by the Environmental Technical Specifications and will be operated to provide continuing protection of the environment.

Specifications

5.1 Organization, Responsibilities, Review and Audits

5.1.1 Organization and Responsibilities

- 5.1.1.1 The ultimate responsibility for the implementation of the Environmental Technical Specifications shall reside with the corporate officers of Consolidated Edison Company of New York, Inc. The corporate and Station level organization chart is shown in Figure 5.1-1.
- 5.1.1.2 The Plant Manager shall have direct responsibility for the safe operation and maintenance of all facilities comprising Indian Point Station and to assure that the limiting conditions of operation as noted in the Environmental Technical Specifications as defined herein are not exceeded. This responsibility shall be expressly delegated to a specified member of the Station management staff during any off-duty status period of the Plant Manager. The Chief Operations Engineer, who shall report to the Plant Manager, shall have direct responsibility for the safe operation of all nuclear Units at the Station. The Operations Engineer, who shall report to the Chief Operations Engineer, shall have direct responsibility for the safe operation of his assigned nuclear Unit. The Plant Manager shall report to the Manager of the Nuclear Power Generation Department who reports to the Senior Vice President of Power Supply, who is in charge of all of its generating facilities. See Section 6.1 of Appendix A, Technical Specifications for a detailed description of responsibility of the licensee's facilities.
- 5.1.1.3 The Senior Engineer, Environmental, Nuclear and Gas Testing Group, shall report via the Division Engineer, Chief Chemical Engineer, and Manager, Operations Services, to the Assistant Vice President, Power Generation Operations and either he, or his designee, has primary responsibility for the conduct of the nuclear environmental monitoring program and long term or life-of-the-plant type environmental monitoring programs. The Chief Nuclear and Emissions Control Engineer, who shall report to the Assistant Vice President, Engineering, and the Director of the Biology Department, who shall report to the Vice President, Environmental Affairs of the Company, have primary responsibility for execution of environmental surveillance studies.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 17 TO LICENSE NO. DPR-5, AMENDMENT NO. 37 TO
LICENSE NO. DPR-26 AND AMENDMENT NO. 11 TO LICENSE NO. DPR-64
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NOS. 1, 2 AND 3
DOCKETS NOS. 50-3, 50-247 AND 50-286

Introduction

Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications", is the basis for reporting requirements found in Technical Specifications today. When these Technical Specifications were issued we requested that licensees use the formats in the guide for the Licensee Event Report (LER) and Monthly Operating Report. In some cases licensees' use of these formats was required by a reference to Regulatory Guide 1.16 in the Technical Specifications. After two years of experience with the reporting requirements identified in this guide, we reviewed the scope of information licensees are required to submit in the LER, Annual Operating Report, Monthly Operating Report and Startup Report.

Based on our review of LER's, we developed a modified format for the LER to make this document more useful for evaluation purposes. By letters sent in July and August 1977, we informed licensees of the new LER format and requested that they use it. For those licensees who reference Regulatory Guide 1.16 in their Technical Specifications, we also requested that they propose a change which would replace this reference with appropriate words from the guide and which would delete mandatory use of the reporting forms contained in the guide.

From our review of all licensee reports, we determined that much of the information found in the Annual Operating Report either is addressed in the LER's or Monthly Operating Reports, which are submitted in a more timely manner, or could be included in these reports with only a slight augmentation of the information already supplied. Therefore, we concluded that the Annual Operating Report could be deleted as a Technical Specification requirement if certain additional information were provided in the Monthly Operating Reports. As a result we sent letters during September 1977 to licensees informing them that a revised and improved format for Monthly Operating Reports was available and requested that they use it. For those licensees with the Technical

Specification reference to Regulatory Guide 1.16 the change deleting this reference, discussed above, would be necessary. In addition, licensees were informed that if they agreed to use the revised format they should submit a change request to delete the requirement for an Annual Operating Report except that occupational exposure data must still be submitted.

By letters dated November 2, 1977, Consolidated Edison Company of New York (Con Edison) proposed amendments to the Indian Point Nuclear Generating Units Nos. 1, 2 and 3 licenses. The amendments would modify the Technical Specifications to permit use of LER and Monthly Operating Report formats different than those contained in Regulatory Guide 1.16 and delete the requirements for Annual Operating Reports. Con Edison also proposed to delete the current respiratory protection program requirements from the Technical Specifications, as these requirements are now covered by 10 CFR 20 Section 20.103. In addition, Con Edison has proposed to:

1. Change Technical Specifications to clarify Nuclear Facilities Safety Committee responsibilities;
2. Change organizational chart to reflect current organizational responsibilities to show that the Manager-Nuclear Power Generation Department would report directly to the Officer In Charge of Power Supply; and
3. For Units 2 and 3 add the Refueling Engineer as a member of the Station Nuclear Safety Committee.

Evaluation

The proposed change which would replace the reference to RG 1.16 with appropriate wording from that guide is administrative in nature and does not change the operation of the reactors. This change provides wording in the Technical Specifications which identifies the required reports, states the circumstances under which they should be submitted and details the timing of such submittals. The text does not specify in great detail the format and content of the reports as was previously done by reference to the guide. The proposed change provides greater flexibility to accommodate changes to the reporting system and allows the licensee to use the recently revised LER and Monthly Operating Report formats and is therefore acceptable.

The licensee has also proposed to delete all but one of the four specified items in the Annual Operating Report. The report which tabulates occupational exposure on an annual basis is needed and therefore, the requirement to submit this information has been

retained. We have determined that the failed fuel examination information does not need to be supplied routinely by licensees because this type of historical data can be obtained in a compiled form from fuel vendors when needed. The information concerning forced reductions in power and outages will be supplied in the revised Monthly Operating Reports and the narrative summary of operating experience will be provided on a monthly basis in the Monthly Operating Report rather than annually.

Con Edison also proposed deletion of current requirements regarding respiratory protection to eliminate conflict with 10 CFR §20.103, as revised November 29, 1976. This agrees with the provision in the current Technical Specifications which allow such deletion upon adoption of the proposed change to 10 CFR §20.103. In the future, as specified in the regulations, allowance may be made for the use of respiratory protective equipment only if its use is as stipulated in Regulatory Guide 8.15, Acceptable Programs for Respiratory Protection. Based on the above, we find this change acceptable.

The proposed change to the Technical Specification functions listed for the Nuclear Facilities Safety Committee (NFSC) will more clearly identify the Committee's review responsibilities by specifying their responsibility for radiological environmental effects. In addition, review of non-destructive testing and administrative controls will now be specifically identified as activities that the NFSC reviews. The clarification of review functions for environmental matters is proper because non-radiological environmental effects are independently reviewed by the Environmental Protection Committee. Also, the addition of other activities for review by the NFSC is more conservative and therefore, acceptable. Similarly, the proposed change in the organizational chart reflects the current Con Edison organization already accepted by the Commission as part of the Appendix B Technical Specifications.

We have included revised page 5.1-1 of the Appendix B Technical Specifications as its revision was inadvertently omitted when the Environmental Technical Specifications were changed on November 16, 1977. This change corrects the administrative controls section of the Environmental Technical Specifications to be consistent with Con Edison's present organization and other sections of Appendix B Technical Specifications.

Environmental Consideration

We have determined that these amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve

an action which is insignificant from the standpoint of environmental impact, and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: February 3, 1978

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKETS NOS. 50-3, 50-247 AND 50-286

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

POWER AUTHORITY OF THE STATE OF NEW YORK

NOTICE OF ISSUANCE OF AMENDMENTS TO OPERATING LICENSES

The U. S. Nuclear Regulatory Commission (the Commission) has issued to Consolidated Edison Company of New York, Inc. (Con Ed), Amendment No. 18 to Provisional Operating License No. DPR-5 for the Indian Point Nuclear Generating Unit No. 1, and Amendment No. 37 to Facility Operating License No. DPR-26 for the Indian Point Nuclear Generating Unit No. 2, and has issued to Con Ed and the Power Authority of the State of New York, Amendment No. 11 to Facility Operating License No. DPR-64 for Indian Point Nuclear Generating Unit No. 3. These amendments revised Technical Specifications for operation of Indian Point Units Nos. 1, 2 and 3 located in Buchanan, Westchester County, New York. The amendments are effective as of the date of issuance.

These amendments revise the Technical Specifications to change requirements for administrative controls.

The applications for the amendments comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments.

Prior public notice of these amendments was not required since the amendments do not involve a significant hazards consideration.

The Commission has determined that the issuance of these amendments will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement, negative declaration or environmental impact appraisal need not be prepared in connection with issuance of these amendments.

For further details with respect to this action, see (1) the applications for amendments transmitted by letters dated November 2, 1977, (2) Amendment No. 18 to License No. DPR-5, (3) Amendment No. 37 to License No. DPR-26, (4) Amendment No. 11 to License No. DPR-64, and (5) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D. C. and at the White Plains Public Library, 100 Martine Avenue, White Plains, New York. A copy of items (2) through (5) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this 3rd day of February 1978.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors