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June 27, 2001

Re: Indian Point Unit No. 1
Docket No. 50-003
NL-01-085

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station O-P1-17
Washington, DC 20555-0001

Subject: Response to NRC Request for Additional Information
Relative to Proposed Technical Specification Changes for Indian Point
Unit No. 1

- References:
1. Consolidated Edison Letter to NRC, NL 00-121
"Proposed Technical Specification Amendment Consisting of
Administrative Changes," dated October 5, 2000
 2. Electronic Mail (J. Minns, NRC, to R. Louie, Con Edison) dated
March 30, 2001 (Accession No. ML 011220435 dated April 4,
2001)

By letter dated October 5, 2000 (Reference 1), Consolidated Edison Company of New York, Inc. ("Con Edison") requested an amendment to the Indian Point Unit No. 1 Technical Specifications. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed this submittal and requested additional information by electronic mail (J. Minns, NRC, to R. Louie, Con Edison) dated March 30, 2001.

Attachment 1 to this letter provides Con Edison's response to the subject request for additional information.

No new regulatory commitments are being made by Con Edison in this correspondence.

Should you or your staff have any concerns regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing at 914-734-5074.

Sincerely,

A - Alan Blind

Attachments

A001

cc: Mr. Hubert J. Miller
Regional Administrator-Region I
U.S. Nuclear Regulatory Commission
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King of Prussia, PA 19406

Mr. Patrick D. Milano, Senior Project Manager, Section 1
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Mr. John L. Minns, Project Manager
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ATTACHMENT 1 TO NL-01-085

Response to Request for Additional Information
Technical Specification Administrative Changes
Indian Point Unit No. 1

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 1
DOCKET NO. 50-3
JUNE 2001

The NRC request for addition information in reference to the "Proposed Technical Amendment Consisting of Administrative Changes" for Indian Point Unit No. 1 dated October 5, 2000, and Con Edison's responses are provided below.

Request 1: What section of the QAPD is Technical Specification (TS) section 3.2.1.a, 3.2.1.e, and 3.2.1.f?

Response to Request 1: QAPD sections 3.2 and QAPD Appendix B sections 1.1, 1.6, and 2.1 (see below.).

Request 2: Is the IP1 QAPD the same as IP-2?

Response to Request 2: Yes, the QAPD governs both units.

Request 3: If different QAPD for Operating and SAFSTOR, does IP-1 QAPD meets Appendix B of 10 CFR Part 50?

Response to Request 3: This is not applicable.

Request 4: Provide a copy of the relocated QAPD section.

Response to Request 4: See the following excerpted QAPD changes.

Excerpts from the QAPD Rev. 16 section which incorporates the change to Indian Point Unit 1 Technical Specification 3.2.1.a are provided below. The changes incorporated in Revision 16 of the QAPD are in bold italics.

QAPD Section 3.2 Assignment of Authority & Responsibility

The Senior Vice President Nuclear Operations is the Chief Nuclear Officer and has overall responsibility for the Indian Point Nuclear Power Stations Units 1 & 2. Chart B depicts the Chief Nuclear Officer's organization. The Department Manager of Quality Assurance, the Vice President Nuclear Power, the Vice President Nuclear Engineering and the General Manager Business Services report directly to the Senior Vice President Nuclear Operations. Managers responsible for Human Resources, the Employee Concerns Program and the Environmental, Health and Safety Programs also report to the Senior Vice President.

The Vice President, Nuclear Power is responsible for the day-to-day operation and maintenance at the plant. The Plant Manager and the Manager of the Corrective Action Group report to him. *Chart C depicts the Nuclear Power Organization.*

The Plant Manager directs the operation and maintenance of the plant. There are several managers reporting to the Plant Manager. A manager is responsible for the operation of the reactor, performance of surveillances and testing, preparation and control of procedures necessary to support the normal and off-normal operation of facility, and control of equipment. A manager is responsible

for the performance of preventative maintenance, corrective maintenance, installation of design modifications, and the control and calibration of measuring and test equipment (MT&E). A manager is responsible for the radiation program, the chemistry program, radiological support, and the radwaste program. A manager is responsible for controlling work at the station and another is responsible for planning and executing outages.

The Indian Point Unit 1 Project Manager has authority over the conduct of Unit 1 activities. The Unit 1 Project Manager is responsible to the Indian Point Station Plant Manager for assuring that these activities are performed in accordance with the quality assurance program.

Excerpts from QAPD Rev. 16, Appendix B “Review and Audit Program” Section which incorporates changes to Indian Point Unit No. 1 Technical Specification 3.2.1.e are provided below. The changes incorporated in Revision 16 of the QAPD are in bold italics.

1.0 Station Nuclear Safety Committee (SNSC)

Section 1.1 Function

The Station Nuclear Safety Committee shall function to advise the Vice President-Nuclear Power on all matters related to nuclear safety.

Section 1.6 Responsibilities

The Station Nuclear Safety Committee shall be responsible for:

- a. Review of (1) all procedures required by *Indian Point Unit 2* Technical Specification 6.8 and changes *to procedures that change the document’s intent*, and (2) any other proposed procedures or changes thereto as determined by the Chairman of SNSC 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, facility operations to detect potential nuclear safety hazards,
- 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 Vice President, Nuclear Power and to the Chairman of the Nuclear Facilities Safety Committee,
- f. Review of facility operations to detect potential nuclear safety hazards,
- g. Performance of special reviews and investigations and the issuance of reports thereon as required by the Chairman of the Nuclear Facilities Safety Committee,

- h. Review of any unplanned, radioactive release, including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President, Nuclear Power and to the Nuclear Facility Safety Committee,
- i. Review of changes to the Process Control Program and the Offsite Dose Calculation Manual,
- j. Review of the Fire Protection Program and implementing procedures and submission of recommended changes to the Chairman of the Nuclear Facilities Safety Committee.
- k. Review of Unit 1 Operating Organization***

Excerpts from the QAPD Rev. 16 Appendix B section which incorporates changes to Indian Point Unit No. 1 Technical Specification 3.2.1.f are provided below. The changes incorporated in Revision 16 of the QAPD are in bold italics.

2.0 Nuclear Facilities Safety Committee (NFSC)

2.1 Function

The Nuclear Facilities Safety Committee shall function *as an advisory body to the Senior Vice President, Nuclear Operations and* provides independent review and *oversight of station* 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