Item 15

April 13, 2000

NOTE TO: Executive Team

FROM: Marsha Gamberoni, NRR

SUBJECT: INDIAN POINT 2 (IP2) TECHNICAL SPECIFICATIONS AND RESTART APPROVAL

Attached are pages from the IP2 Technical Specifications related to Steam Generator Tube Inspection. Currently IP2 is in Table 4.13-1, result C-3 which requires the licensee to submit a report to the NRC and NRC approval prior to startup. The specification does not identify who in the agency should sign the letter approving startup.

With respect to internal documents, I have reviewed Office Letter 101 for any guidance related to signature authority. The project manager is the delegated signature authority for all routine correspondence related to the normal processing of applications and related reviews, including transmittal of question lists, SEs, SERs, licenses, amendments, exemptions, orders and items related to meetings. Approvals or changes to license conditions, the technical specifications,... are signed by the DLPM section chief. Note that the IP2 C-3 condition does not require an amendment, just approval to restart.

As a comparison, regulations that require approvals, such as 10 CFR 50.55a or 10 CFR 50.61, usually specify the Office Director, but signature authority is delegated to lower levels in the organization.

I checked with OGC (J. Moore and J. Rutberg), TSB (B. Beckner) and DE. None of these groups were aware of any similar situations or had any clarifications regarding the words in the specification.

While none of the above require a signature on the restart letter higher than the project manager, my recommendation is that consideration be given to a Division Director or higher signing out the letter, given the technical sensitivity on the issues associated with these steam generators and the level of external interest in this plant.

Please let me know if you need additional information.

cc: J. Harold
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