

A. Alan Blind
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 734-5340
Fax: (914) 734-5718
blindaa@coned.com

July 20, 1999

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

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

Subject: Proposed Amendment Consisting Of An Administrative
Change To The Technical Specifications

Reference: 1) Con Edison Letter dated January 22, 1999, A. A. Blind
To Document Control Desk

Transmitted herewith are the original and two (2) copies of an "Application for Amendment to the Operating License," sworn on July 20, 1999. This application requests an amendment to the Consolidated Edison Company of New York, Inc. (Con Edison), Indian Point Unit No. 1 Technical Specifications. In accordance with 10 CFR 50.91, a copy of this application and the associated attachments are being submitted to the designated New York State official.

Con Edison transmitted (Reference 1) proposed changes to the Indian Point 2 Technical Specifications which included a revision to Section 6.2.2.h to change the senior reactor operator license requirement for the Operations Manager. This application provides a proposed amendment to the Indian Point 1 Technical Specifications to provide a similar change to Section 3.2.1.i.

Attachment I to this letter provides the proposed new Technical Specification 3.2.1.i, while Attachment II provides the Safety Assessment. It has been determined that the administrative change set forth herein does not represent a significant hazards consideration as defined by 10 CFR 50.92(c).

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

Very truly yours,

A. Alan Blind

930063

Acc 1/1

9908030227 990720
PDR ADOCK 05000003
P PDR

C13

Attachments

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

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

Mr. Jefferey F. Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

Mayor, Village of Buchanan
236 Tate Avenue
Buchanan, NY 10511

Mr. Paul Eddy
State of New York Department of Public Service
3 Empire Plaza
Albany, NY 12223

Mr. William F. Valentino, President
New York State Energy, Research and Development Authority
Corporate Plaza West
286 Washington Ave. Extension
Albany, NY 12223-6399

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
CONSOLIDATED EDISON COMPANY) Docket No. 50-3
OF NEW YORK, INC.)
(Indian Point Station,)
Unit No. 1))

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

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

This Application for amendment to the Indian Point 1 Technical Specifications seeks to amend Section 3.2.1.i by revising the senior reactor operator license requirement for the Operations Manager.

The specific proposed Technical Specification Revision is set forth in Attachment I to this Application. A Safety Assessment of the proposed change is set forth in Attachment II to this Application. This assessment demonstrates that the proposed change does not represent a significant hazards consideration as defined in 10 CFR 50.92(c). Attachment III to this Application contains a summary of the proposed change.

As required by 10 CFR 50.91(b)(1), a copy of this Application and our analysis concluding that the proposed change does not constitute a significant hazards consideration have been provided to the appropriate New York State official designated to receive such amendments.

BY: A. Alan Blind
A. Alan Blind
Vice President - Nuclear Power

Subscribed and sworn to
before me this 20th day
July, 1999.

9908030229 990720
PDR ADOCK 05000003
P PDR

Karen L. Lancaster
Notary Public

KAREN L. LANCASTER
Notary Public, State of New York
No. 60-4643659
Qualified In Westchester County
Term Expires 9/30/99

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGE

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 1
DOCKET NO. 50-3
JULY 20, 1999**

9908030232 990720
PDR ADOCK 05000003
P PDR

- f. The Nuclear Facilities Safety Committee shall function to provide independent review and audit of designated activities in areas of nuclear engineering, chemistry, radiochemistry, metallurgy and non-destructive testing, instrumentation and control, radiological safety, mechanical and electrical engineering, administrative controls and quality assurance activities, and radiological environmental effects.
- g. All fuel handling shall be under the direct supervision of a licensed operator.*
- h. The Senior Watch Supervisor is responsible for operations at the Unit No. 1 facility.
- i. The qualification requirements of the Operations Manager and the Assistant Operations Manager are provided in Sections 6.2.2 and 6.3 of Appendix A to the Indian Point Unit No. 2 Facility Operating License No. DPR-26.

* Licensed operator for IP-2

3.3 Operating Instructions and Procedures

- 3.3.1 No fuel will be loaded into the reactor core or moved into the reactor containment building without prior review and authorization by the Nuclear Regulatory Commission.
- 3.3.2 Detailed written instruction setting forth procedures used in connection with the operation and maintenance of the nuclear power plant shall conform to the Technical Specifications.
- 3.3.3 Operation and maintenance of equipment related to safety when there is no fuel in the reactor shall be in accordance with written instructions.

ATTACHMENT II

SAFETY ASSESSMENT

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT UNIT NO. 1
DOCKET NO. 50-3
JULY 20, 1999**

SECTION I - Description of Change

Con Edison transmitted (Reference 1) proposed changes to the Indian Point 2 Technical Specifications which included a revision to Section 6.2.2.h and to Section 6.3.1 to change the senior reactor operator license requirement for the Operations Manager. This application provides a proposed amendment to the Indian Point 1 Technical Specifications to provide a similar change to Section 3.2.1.i.

Currently Indian Point Unit No.2 Technical Specification 6.2.2.h states:

"The Operations Manager shall hold a senior reactor operator license."

Reference 1 proposes to change the Indian Point Unit No.2 Technical Specification 6.2.2.h to:

"The Operations Manager or Assistant Operations Manager shall hold a senior reactor operator license."

Currently Indian Point Unit No.2 Technical Specification 6.3.1 states:

"Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975."

Reference 1 proposes to change the Indian Point Unit No.2 Technical Specification 6.3.1 to:

"Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Operation Manager's and the Assistant Operation Manager's SRO license requirement which shall be in accordance with Technical Specification 6.2.2.h, and, (2) the Radiation Protection Manager who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975."

Currently Indian Point Unit No.1 Technical Specification 3.2.1.i states:

"The Operations Manager shall hold a senior reactor operator license.*

***Licensed operator for IP-2"**

This submittal proposes to change the Indian Point Unit No.1 Technical Specification 3.2.1.i to:

"The qualification requirements of the Operations Manager and the Assistant Operations Manager are provided in Sections 6.2.2 and 6.3 of the Indian Point Unit No. 2 Technical Specifications."

SECTION II - Evaluation of Change

Presently Indian Point Unit No. 1 Technical Specification 3.2.1.i and Indian Point Unit No. 2 Technical Specification 6.2.2.h have identical requirements. The proposed change, coupled with the changes proposed in Reference 1, will maintain the same requirements in both Technical Specifications

Indian Point Unit No. 2 Technical Specification 6.2.2.h currently requires the Operations Manager (OM) to hold a Senior Reactor Operator's (SRO) license. In Reference 1 Con Edison proposed to modify this requirement to have the OM or the Assistant Operations Manager (AOM) hold an SRO license. Current practice at Indian Point 2 is to have two SRO licensed positions in charge of shift activities. These two positions are the Senior Reactor Operator and the Senior Watch Supervisor (SWS). The AOM is directly in the reporting hierarchy between the SWS and the OM. The day-to-day activities of the Operations Department are carried out under the direction of the AOM. Thus, by requiring either the OM or the AOM to hold an SRO license, there is assurance that the SWS will report to an individual with an SRO license.

Indian Point Unit No. 2 Technical Specification 6.3.1 currently requires that facility staff meet or exceed all the requirements of ANSI N18.1-1971 ("Selection and Training of Nuclear power Plant Personnel"). Section 4.2.2 of ANSI N18.1-1971, states:

"At the time of . . . appointment to the active position the operations manager shall hold a Senior Reactor Operator's License."

While, ANSI N18.1-1971 makes no mention of an Assistant Operations Manager, NUREG-1431, Rev. 1 ("Standard Technical Specifications - Westinghouse Plants"), Section 5.2.2.f, states:

"The Operations Manager or Assistant Operations Manager shall hold an SRO license."

Thus the Reference 1 proposed changes to Indian Point Unit No. 2 Technical Specifications 6.2.2.h and 6.3.1 are consistent with Section 5.2.2.f of NUREG-1431. Since the OM and the AOM will still be required to meet or exceed all of the other ANSI N18.1-1971 minimum requirements, there is assurance that the OM and the AOM will be knowledgeable and qualified individuals. By requiring that either the OM or the AOM hold an SRO license, there is assurance that high-level management within the Operations Department will maintain a knowledge of current plant systems and operation.

Therefore, the Con Edison proposal (Reference 1) to modify the requirement to have the OM and the AOM meet all the qualification requirements of ANSI N18.1-1971 except for the SRO license requirement which would be in accordance with the Technical Specifications, will allow an individual who does not hold a current SRO license to be appointed as Operations Manager or Assistant Operations Manager provided all the other qualification requirements of ANSI N18.1-1971 are met.

SECTION III - No Significant Hazards Evaluation

The proposed change does not involve a significant hazards consideration because:

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

No. This proposed change is administrative in nature. In addition, this proposed change is consistent with the statement in NUREG-1431, Rev. 1, Section 5.2.2.f. This change does not affect possible initiating events for accidents previously evaluated or alter the configuration or operation of the facility. The Limiting Safety System Settings and Safety Limits specified in the current Technical Specifications remain unchanged. Therefore, the proposed change would not involve a significant increase in the probability or in the consequences of an accident previously evaluated.

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

No. This proposed change is administrative in nature. The safety analysis of the facility remains complete and accurate. There are no physical changes to the facility and the plant conditions for which the design basis accidents have been evaluated are still valid. The operating procedures and the emergency procedures are unaffected. Consequently no new failure modes are introduced as a result of the proposed change. Therefore, the proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

No. This proposed change is administrative in nature. Since there are no changes to the operation or the physical design of the facility, the Updated Final Safety Analysis Report (UFSAR) design basis, accident assumptions, or Technical Specification Bases are not affected. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, the proposed change to the Technical Specifications does not involve a significant hazards consideration. In addition, the proposed change to the Technical Specifications has been reviewed by both the Station Nuclear Safety Committee (SNSC) and the Con Edison Nuclear Facility Safety Committee (NFSC). Both Committees concur that the proposed change does not represent a significant hazards consideration.

SECTION IV - Reference

1. Con Edison Letter from A. A. Blind, to the USNRC Document Control Desk, Subject: "Proposed Amendment Consisting Of Administrative Changes To The Technical Specifications," dated January 22, 1999.