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March 8, 1983

IPN-83-21

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& GENERAL COUNSEL

Director of Nuclear Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Proposed Changes to Technical Specifications
Regarding Management Organization and Titles and Audit
Frequency

1. Generic Letter No. 82-17, D.G. Eisenhut (NRC) to all Licensees dated October 1, 1982
2. Generic Letter No. 82-23, D.G. Eisenhut (NRC) to all Licensees dated October 30, 1982

Dear Sir:

Enclosed for filing are three (3) signed originals and nineteen (19) copies of a document entitled, "Application for Amendment to Operating License," together with forty (40) copies of Attachments I and II thereto comprising a statement of the proposed changes to Technical Specifications and associated Safety Evaluation.

The three proposed changes to the Indian Point 3 Technical Specifications alter the management organization. The first realigns the Procedures and Performance Department of Appendix A, Figure 6.2-1, and changes its name to Quality Assurance and Reliability. The new department assumes the prior duties of the Procedures and Performance Department and, in addition, performs audits and appraisals of the security program. The Vice President - Quality Assurance and Reliability reports directly to the President. This change reflects the Authority's support for quality assurance and its commitment to strengthen administrative and managerial controls throughout the organization, whether or not they are related to nuclear safety.

The second change revises the title of the Senior Vice President - Nuclear Generation to that of Executive Vice President - Nuclear Generation throughout Appendices A and B. This change elevates the title of that position to a level commensurate with the authority and overall responsibilities of the position.

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The third change revises Section 6.5.2.8 (page 6-11), the audit frequency for emergency preparedness and safeguards contingency plans (items e and f), to agree with Title 10 of the Code of Federal Regulations, parts 50.54(t) and 73.40(d). We were notified of these inconsistencies via References 1 and 2. Because this Technical Specification is clarifying, and made at the request of the Commission, no license fee is included for these changes.

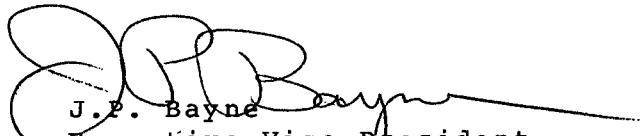
The proposed changed pages are Attachment I to the Application for Amendment enclosed with this letter, while the associated Safety Evaluation is Attachment II.

The Authority has classified this Application for Amendment as Class II since the proposed changes serve to consolidate and strengthen quality assurance functions and have no adverse safety or environmental implications. Enclosed is a check in the amount of \$1,200.00 as the amendment fee as per 10 CFR 170.22, which the Authority pays under protest pending a final determination of the legality of the fee schedule.

It should be noted that the proposed changes do not incorporate prior changes to the management organization proposed to the Commission on June 4, 1982, entitled "Proposed Changes to the Technical Specifications Regarding Management Organization Structure" (JPN-82-48 and IPN-82-43). These prior changes are awaiting approval by the Commission.

If you have any questions regarding the proposed changes please contact Mr. P. Kokolakis of my staff.

Very truly yours,


J.P. Bayne
Executive Vice President
Nuclear Generation

cc: Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 66
Buchanan, N.Y. 10511