

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

MANAGEMENT ORGANIZATION AND TITLES

AND

AUDIT FREQUENCY

POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Resident Manager shall be responsible for overall facility operation. During periods when the Resident Manager is unavailable, the Superintendent of Power will assume his responsibilities. In the event both are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel. The Resident Manager reports directly to the Executive Vice President Nuclear Generation, as shown in Fig. 6.2-1.

6.2 ORGANIZATION OFFSITE

6.2.1 The offsite organization for plant management and technical support shall be as shown on Figure 6.2-1.

PLANT STAFF

6.2.2 The plant organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one Licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Brigade of at least five members shall be maintained on site at all times. This excludes four members of the minimum shift crew necessary for safe shutdown of the plant and any personnel required for other essential functions during a fire emergency. During periods of cold shutdown the Fire Brigade will exclude two members of the minimum shift crew.

- c. Review of all proposed changes to the Operating License and 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 including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Resident Manager, who will forward the report to the Chairman of the Safety Review Committee and Executive Vice President-Nuclear Generation.
- f. Review of events requiring 24 hour notification to the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Resident Manager or the Chairman of the Safety Review Committee (SRC).
- i. Review of the Plant Security Plan and implementing procedures annually.
- j. Review of the Emergency Plan and implementing procedures annually.

AUTHORITY

6.5.1.7 The Plant Operating Review Committee shall:

- a. Recommend to the Resident Manager approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question, as defined in 10 CFR 50.59.
- c. Provide notification within 24 hours to the Chairman of the SRC and the Executive Vice President-Nuclear Generation of disagreement between the PORC and the Resident Manager; however the Resident Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.5 The Plant Operating Review Committee shall maintain minutes of each meeting and copies shall be provided to the Chairman of the SRC and Executive Vice President-Nuclear Generation.

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The SRC shall collectively have the competence required to review problems in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Environment
- k. Civil/Structural Engineering
- l. Emergency Planning
- m. Nuclear Licensing
- n. Other appropriate fields associated with the unique characteristics of a nuclear power plant.

MEMBERSHIP

6.5.2.2. The SRC shall be composed of the following voting members:

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Vice President-Quality Assurance and Reliability
Member:	Vice President Nuclear Support-ENR
Member:	Vice President Nuclear Support-PLR
Member:	Manager-Radiological Health and Chemistry
Member:	Director-Nuclear Design and Analysis
Member:	Director-Electrical Design and Analysis
Member:	Director of Environmental Programs
Member:	Director-Civil/Structural Design and Analysis
Member:	Director-Mechanical Design and Analysis
Member:	Director-Piping and Process-Design and Analysis
Member:	Manager Operational Analysis and Training

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of facility operation following initial fuel loading and at least once per six months, thereafter.

QUORUM

6.5.2.6 A quorum of SRC shall consist of the Chairman or Vice-Chairman and four members, including alternates. No more than a minority of the quorum shall have a direct line responsibility for the operation of the plant.

AUDITS

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

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of 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.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- f. The Facility Security Plan (including the Safeguards Contingency Plan) and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the SRC or the Executive Vice President-Nuclear Generation.
- h. The Facility Fire Protection Program and implementing procedures at least once per two years.
- i. A fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

AUTHORITY

6.5.2.9 The SRC shall report to and advise the Executive Vice President-Nuclear Generation on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records will be maintained in accordance with ANSI 18.7-1972. The following shall be prepared, approved and distributed as indicated below:
- a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the Executive Vice President-Nuclear Generation within 14 days after the date of the meeting.
 - b. Reports of reviews encompassed by Section 6.5.2.7 above shall be prepared, approved and forwarded to the Executive Vice President-Nuclear Generation within 14 days following completion of the review.
 - c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Executive Vice President-Nuclear Generation and to the management positions responsible for the areas audited within 30 days after the completion of the audit.

CHARTER

- 6.5.2.11 Conduct of the committee will be in accordance with a charter, approved by the Executive Vice President-Nuclear Generation, setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE OCCURRENCE ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:
- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
 - b. Each REPORTABLE OCCURRENCE requiring 24 hours notification to the Commission shall be reviewed by the PORC and a report submitted by the Resident Manager to the Chairman of the SRC and Executive Vice President-Nuclear Generation.

6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
- a. The reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36(c)(1)(i).
 - b. The Safety Limit violation shall be reported immediately to the Commission. The Chairman of the SRC and Executive Vice President-Nuclear Generation will be notified within 24 hours.

- c. A Safety Limit Violation Report shall be prepared by the PORC. This report shall describe (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence 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 Chairman of the SRC and the Executive Vice President-Nuclear Generation by the Resident Manager.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.

6.8.2 Temporary changes to procedures above may be made provided:

- a. The intent of the original procedures is not altered.
- b. The change is approved by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
- c. The change is documented, reviewed by the PORC and approved by the Resident Manager within 14 days of implementation.

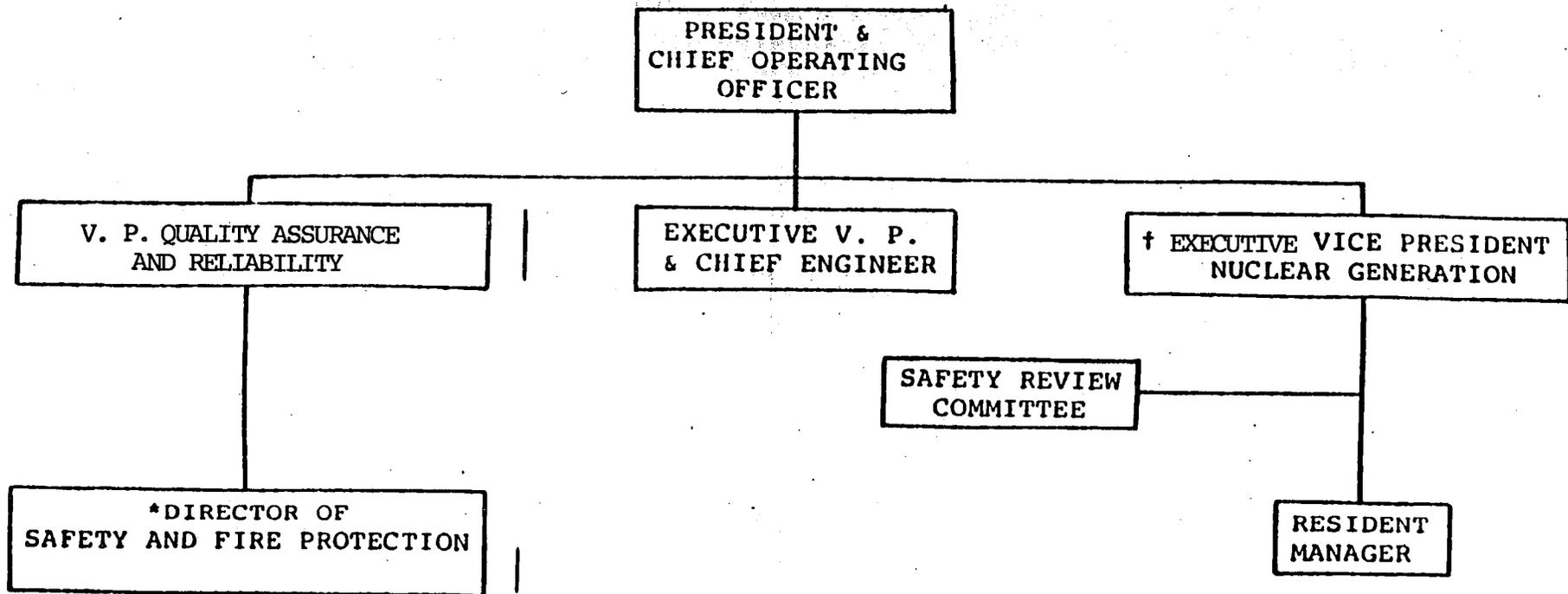
6.8.3 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the PORC and approved by the Resident Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

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 Regional Office of Inspection and Enforcement unless otherwise noted.

AMENDMENT NO. 32, 39, 42



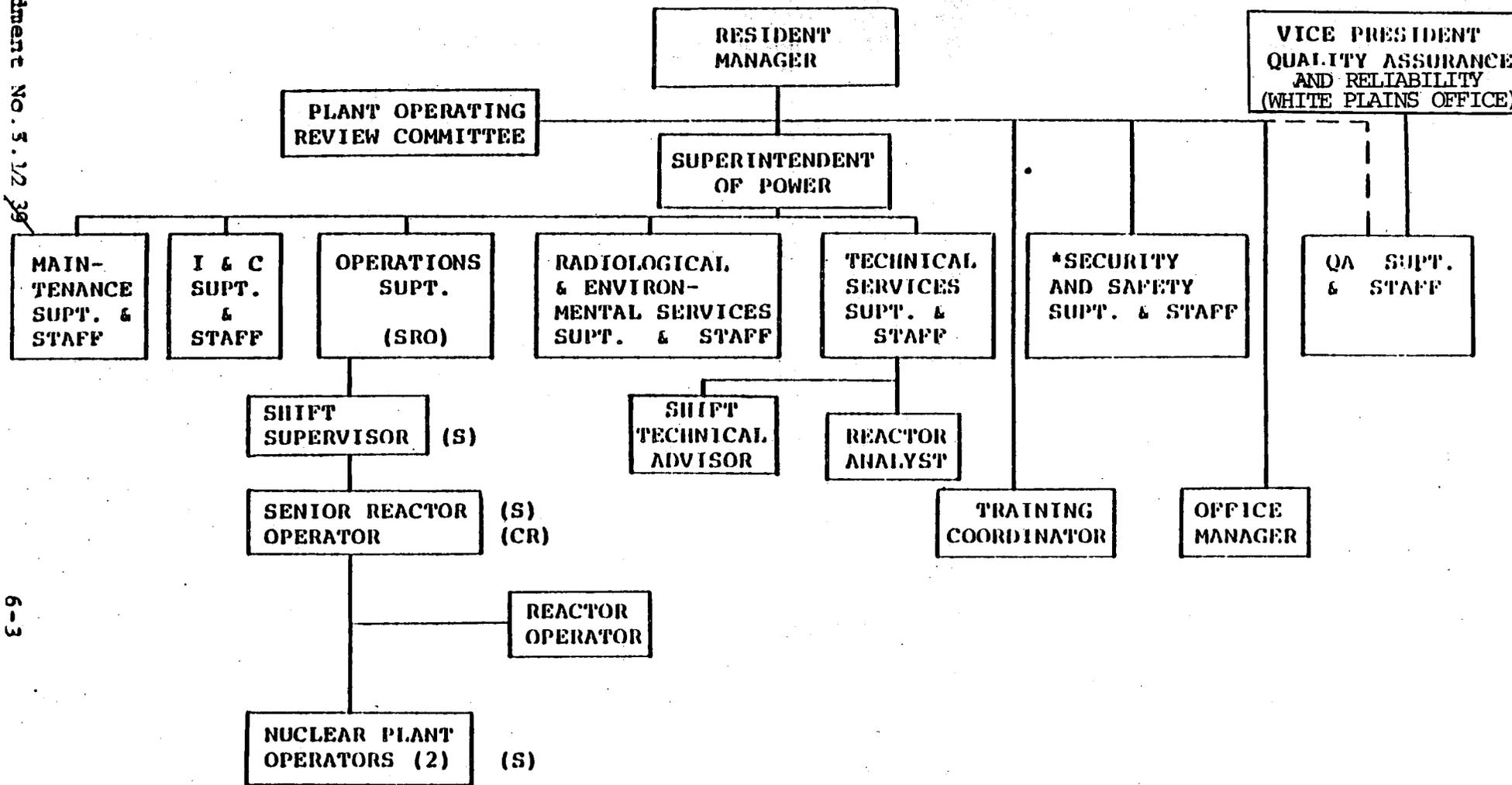
†The Executive Vice President Nuclear Generation is responsible for administering the fire protection program.

*The Director of the Safety and Fire Protection Division, which is part of the Quality Assurance and Reliability Department, is the off-site management position responsible for assessing the effectiveness of the fire protection programs by conducting reviews and audits.

6-2

FIGURE 6.2-1

MANAGEMENT ORGANIZATION CHART
INDIAN POINT 3 NUCLEAR POWER PLANT



(S) Continuous Coverage
 (CR) Control Room
 (SRO) Senior Reactor Operator

FIGURE 6.2-2

POWER AUTHORITY OF THE STATE OF NEW YORK
 INDIAN POINT 3 NUCLEAR POWER PLANT
 PLANT STAFF ORGANIZATION

*Responsibility for performance and monitoring of the fire protection program.

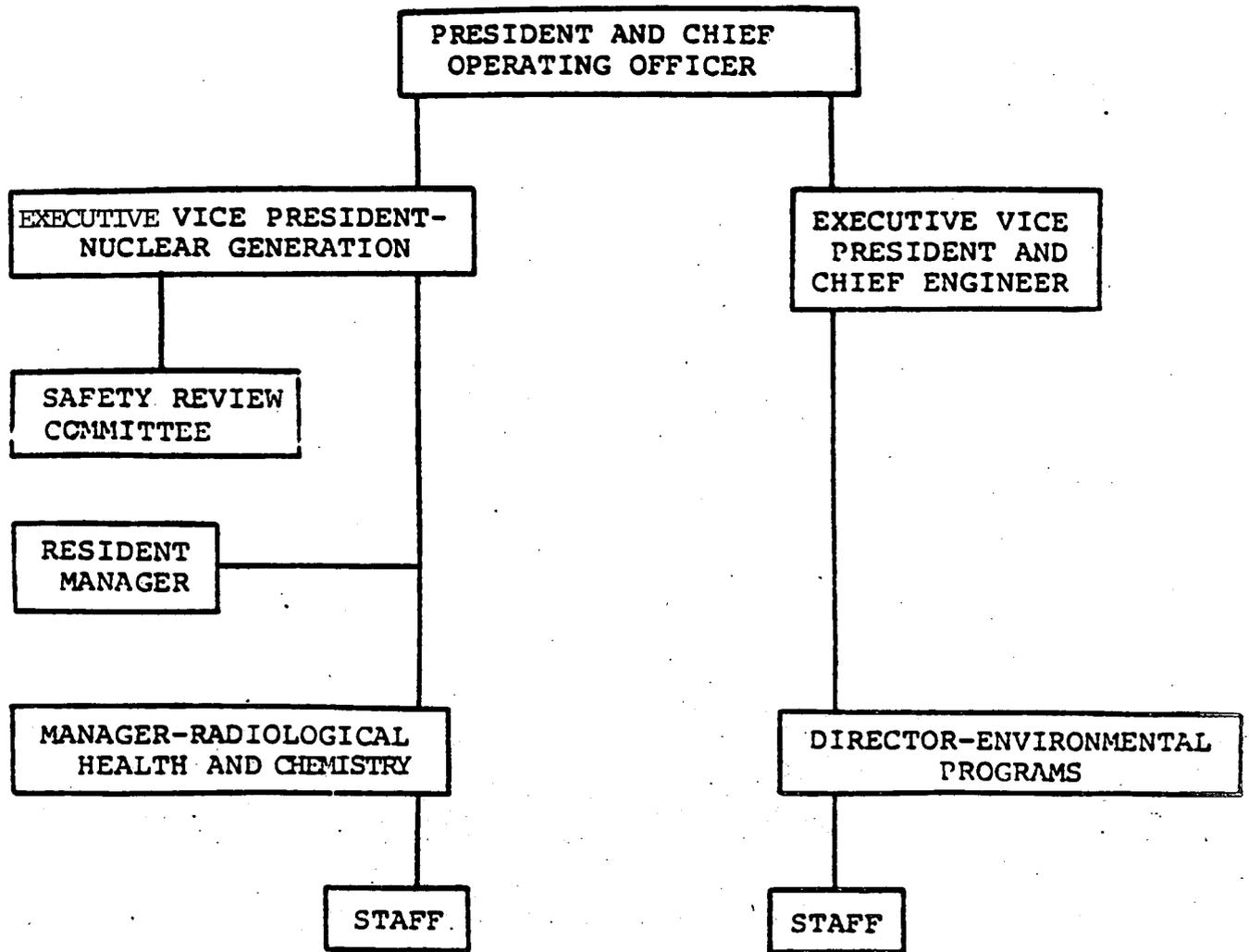


FIGURE 5.2-2
 MANAGEMENT ORGANIZATION-OFFSITE ENVIRONMENTAL
 INDIAN POINT 3 NUCLEAR POWER PLANT

Amendment No. 37 42

ATTACHMENT II

SAFETY EVALUATION

RELATED TO

MANAGEMENT ORGANIZATION AND TITLES

AND

AUDIT FREQUENCY

POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT 3 NUCLEAR POWER PLANT
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Section I - Description of the Changes

In Figure 6.2-1 of Appendix A, page 6-2, "Procedures and Performance" is replaced by "Quality Assurance and Reliability". Also in this figure, the position entitled "Director of Safety and Fire Protection Procedures and Performance" is renamed as "Director of Safety and Fire Protection." The phrase "which is part of the Quality Assurance and Reliability Department," is added to the sentence denoted by an asterisk. Also in this sentence, "Safety and Fire Protection" has been changed to "the Safety and Fire Protection Division".

In Section 6.5.2.2 (page 6-9) and in Figure 6.2-2 (page 6-3) of Appendix A, the words "Quality Assurance" are replaced by the words "Quality Assurance and Reliability."

The title of Senior Vice President - Nuclear Generation is changed to Executive Vice President - Nuclear Generation in Appendix B, Figure 5.2-2 (page 5-8) and in Appendix A, Sections 6.1.1 (page 6-1), 6.5.1.6e (page 6-7), 6.5.1.7c (page 6-7), 6.5.1.8 (page 6-8), 6.5.2.8g (page 6-11), 6.5.2.9 (page 6-11), 6.5.2.10 a through c (page 6-12), 6.5.2.11 (page 6-12), 6.6.1b (page 6-12), 6.7.1b (page 6-12), and 6.7.1d (page 6-13).

Lastly, Section 6.5.2.8, page 6-11, the audit frequency for emergency preparedness and safeguards contingency plans is revised to agree with the requirements of parts 73.40(d) and 50.54(t) of Title 10 of the Code of Federal Regulations.

Section II - Purpose of the Changes

Procedures and Performance was a department responsible for audits and appraisals of various activities within the Authority. The following divisions were included under that department.

- 1) Operating Procedures and Performance
- 2) Maintenance Procedures and Performance
- 3) Radiological and Environmental Protection Procedures and Performance
- 4) Training and Administration Procedures and Performance
- 5) Project Construction Procedures and Performance
- 6) Safety and Fire Protection Procedures and Performance
- 7) Quality Assurance

(Those Procedures and Performance divisions performed independent appraisals of the divisions which conducted the actual functional activities of operations, maintenance, radiological and environmental protection, safety and fire protection, training and administration, and project construction.)

The Authority realigned and renamed the Procedures and Performance Department to focus on quality assurance, system reliability, safety and security, and to extend the overall evaluative capabilities of the department. Under the proposed new organization, the department is redesignated as the Quality Assurance and Reliability Department.

"Quality Assurance" itself is comprised of systematic actions (including management direction and appraisals) necessary to provide confidence that systems, components and personnel are performing satisfactorily. "Reliability" focuses on the regularity, efficiency and predictability with which they perform.

Thus, the new title of the department better expresses the actual functions which that department had in fact been performing. In addition, the new title correctly expresses the strengthened focus and purpose of the department, which is to provide guidance and perform audits and appraisals of the applicable divisions.

With the proposed changes, none of the day-to-day functions formerly performed by the Procedures and Performance Department are discontinued or changed. The realignment of divisions under the new Department of Quality Assurance and Reliability is as follows:

- 1) Operational Appraisal (which incorporates the responsibilities of the prior Operating Procedures and Performance Division and the Maintenance Procedures and Performance Division)
- 2) Radiological and Environmental Appraisal
- 3) Training and Administration Appraisal
- 4) Project Appraisal (which has the identical responsibilities of the prior Project Construction Procedures and Performance Division, but which better describes its functions)
- 5) Safety and Fire Protection
- 6) Quality Assurance
- 7) Security

The seventh division, Security, was added to the jurisdiction of the Quality Assurance and Reliability Department to maintain consistency in the overall evaluative responsibilities of the Department. The functions performed by the Director of Security, who formerly reported to the President, include those of auditing

and appraising site security operations. Under the proposed realignment, the Director of Security reports to the Vice President - of Quality Assurance and Reliability, who in turn reports directly to the President.

Hence, the proposed changes consolidate, under Quality Assurance and Reliability, the Authority personnel who perform auditing and appraisal tasks. However, the daily duties and management of the individual divisions in the Quality Assurance and Reliability Department, including the Security Division and the Quality Assurance Division, are still accomplished independently. The functions performed by the office of the Director of Security remain identical to those of past security operations.

The above changes are an indication of the Authority's support for quality assurance and of its commitment to strengthen administrative and managerial controls throughout the organization, whether or not they are related to nuclear safety.

The change of Senior Vice President - Nuclear Generation to Executive Vice President - Nuclear Generation is a title change only, and does not otherwise impact the organization. The change elevates the title of the senior executive position in the Nuclear Generation Department to a level commensurate with the authority and overall responsibilities of the position.

Lastly, the revision to Section 6.5.2.8 (page 6-11), the audit frequency for emergency preparedness and safeguards contingency plans is revised to agree with Title 10 of the Code of Federal Regulations, parts 50.54(t) and 73.40(d). We were notified of these change inconsistencies via References 4 and 5. This is clarifying, and made at the request of the Commission.

Section III - Implementation of the Changes

The changes, as proposed, do not adversely impact the ALARA or Fire Protection programs at Indian Point 3, nor do they impact the environment. The site Security Division and the site Quality Assurance Division maintain their independence from the plant organization.

Section IV - Conclusion

The incorporation of these changes: a) will not increase the probability or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility of an accident or malfunction of a type other than that evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the basis for any technical specification; and d) does not constitute an unreviewed safety question.

Section V - References

1. Indian Point 3 FSAR, Section 12.1.1.3.2 (Procedures and Performance Department) and Section 12.1.1.3.3 (Security).

2. Indian Point Facility Operating License; Appendix A (Technical Specifications), Section 6.1 (Responsibility), Section 6.2 (Organization), Section 6.5 (Review and Audits), Section 6.6 (Reportable Occurrence Action), Section 6.7 (Safety Limit Violation); Appendix B (Environmental Technical Specifications), Section 5.2 (Administrative Controls - Organization)
3. "Proposed Changes to the Technical Specifications Regarding Management Organization Structure," and IPN-82-43, dated June 4, 1982
4. Generic Letter No. 82-17, D.G. Eisenhut (NRC) to all Licensees dated October 1, 1982
5. Generic Letter No. 82-23, D.G. Eisenhut (NRC) to all Licensees dated October 30, 1982