

Attachment I

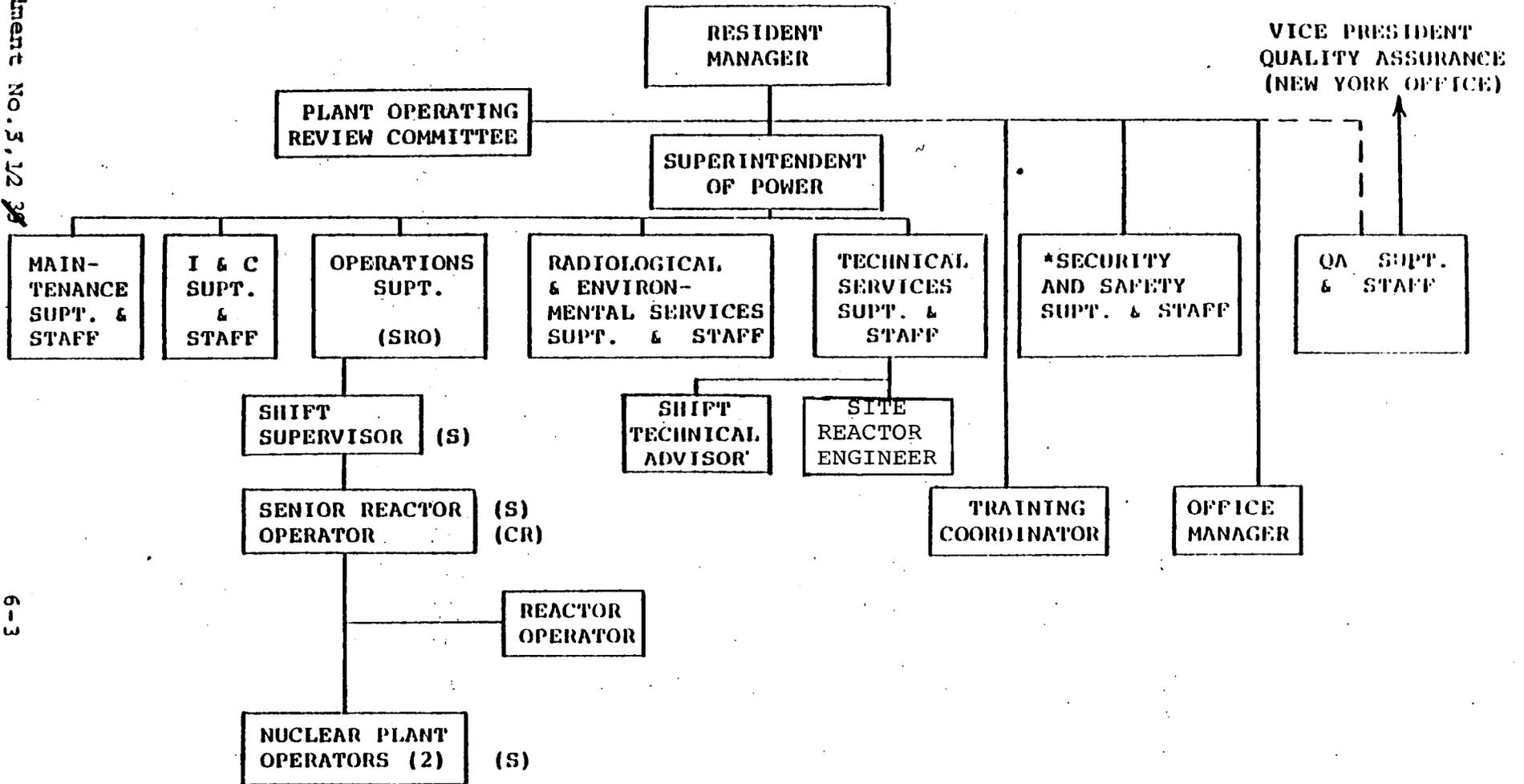
Proposed Technical Specification Changes
IPN-84-13

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

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1.16 REPORTABLE EVENT

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR 50.



- (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.

- 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 Senior Vice President-Nuclear Generation.
- f. Review of all REPORTABLE EVENTS.
- 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 Senior Vice President-Nuclear Generation of disagreement between the PORC and the Resident Manager; however the Resident Manager shall have responsibility for the resolution of such disagreements pursuant to 6.1.1 above.

MEMBERSHIP

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

Chairman:	Manager-Nuclear Safety Evaluation
Vice-Chairman:	Director-Quality Assurance
Member:	Vice President Nuclear Support-BWR
Member:	Vice President Nuclear Support-PWR
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 Alternate members shall be appointed in writing by the SRC Chairman. An Alternate Vice-Chairman shall be appointed in writing by the Executive Vice President-Nuclear Generation if necessary. 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 or Alternate 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.

REVIEW

6.5.2.7 The SRC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications of this Operating License.
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meetings minutes of the Plant Operating Review Committee.

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 Senior 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 Senior 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 Senior 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 Senior Vice President-Nuclear Generation, setting forth the mechanism for implementation of the committee's responsibilities and authority.

6.6 REPORTABLE EVENT ACTION

- 6.6.1 The following actions shall be taken for REPORTABLE EVENTS:
- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
 - b. Each REPORTABLE EVENT shall be reviewed by the PORC and a report submitted by the Resident Manager to the Chairman of the SRC and Senior 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 Senior 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 Senior 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 alerted.
 - 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

- 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.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Sealed source leakage in excess of limits (Specification 3.9)
- b. Inoperable Seismic Monitoring Instrumentation (Specification 4.10)
- c. Primary coolant activity in excess of limits (Specification 3.1.D)
- d. Seismic event analysis (Specification 4.10)
- e. Inoperable fire protection and detection equipment (Specification 3.14)
- f. The complete results of the steam generator tube inservice inspection (Specification 4.9.C)
- g. Inoperable plant vent sampling capability (Table 3.5-4 item 5)

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to Operating Procedures.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all source material of record.
- i. Records of reactor tests and experiments.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transient cycles.
- g. Records of training and qualifications for current members of the plant staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the PORC and the SRC.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.
- m. Records of secondary water sampling and water quality.

6.11 RADIATION AND RESPIRATORY PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure as to maintain exposures as far below the limits specified in 10 CFR Part 20 as reasonably achievable. Pursuant to 10 CFR 20.103 allowance shall be made for the use of respiratory protective equipment in conjunction with activities authorized by the operating license for this plant in determining whether individuals in restricted areas are exposed to concentrations in excess of the limits specified in Appendix B, Table I, Column 1 of 10 CFR 20.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each high radiation area in which the intensity of radiation is 1000 mrem/hr or less and 100 mrem/hr or greater shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the plant Radiological and Environmental Superintendent or his designee.

* Health Physics Personnel shall be exempt from the RWP issuance requirements for entries into high radiation areas during the performances of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-64 dated October 24, 1980.

6.13.2 By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

Attachment II

Safety Evaluation
Related To
Proposed Technical Specification Changes
IPN-84-13

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

Section I - Description of Change

Sections 1 ("Definitions") and 6 ("Administrative Controls") of Appendix A to the Technical Specifications are being amended commensurate with Generic Letter No. 83-43 ("Reporting Requirements of 10 CFR 50, Sections 50.72 and 50.73, and Standard Technical Specifications") dated December 19, 1983. In addition, Figure 6.2-2 is being amended to more accurately reflect current plant organization and Sections 6.5.2.2, 6.5.2.3, and 6.5.2.6 are being amended to reflect proposed changes in the SRC's membership composition.

Section II - Evaluation of Change

The changes proposed commensurate with Generic Letter No. 83-43 provide for Technical Specification compliance with the new LER regulation as promulgated per 10 CFR 50.73. The change proposed for Figure 6.2-2 does not change the staff organization at IP-3 but rather is intended to more accurately reflect this organization. The change proposed regarding SRC membership composition is intended to facilitate greater availability of the Vice-Chairman in the event the Chairman is unavailable for Special Meetings and to provide for an Alternate Vice-Chairman in the event both the Chairman and Vice-Chairman are unavailable for Special Meetings.

The Authority considers that the proposed changes can be classified as not likely to involve significant hazards considerations since the proposed changes constitute "a purely administrative change to technical specifications" and "a change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations." (Examples (i) and (vii), Federal Register, Vol. 48, No. 67 dated April 6, 1983, page 14870).

Section III - Impact of Change

This change will not impact the following:

- ALARA Program
- Fire Protection Program
- Emergency Plan
- FSAR or SER Conclusions
- Overall Plant Operations

Section IV - Conclusion

The incorporation of these modifications: a) will not increase the probability nor 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 for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the basis for any Technical Specification; d) do not constitute an unreviewed safety question as defined in 10 CFR 50.59; e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section V - References

- (a) IP-3 FSAR .
- (b) IP-3 SER