

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES
RELATED TO SAFETY REVIEW COMMITTEE ORGANIZATION CHANGES

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

B411050367 B41031
PDR ADOCK 05000286
P PDR

RECORDS

6.5.1.8 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 function to provide independent review and audit of designated activities in the areas of:

- 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:	Director-Quality Assurance
Member:	Vice President Nuclear Support - BWR
Member:	Vice President Nuclear Support - PWR
Member:	Vice President - Generic Nuclear Support
Member:	Vice President - Design and Analysis
Member:	Resident Manager - IP3
Member:	Resident Manager - JAF
Member:	Consultant

ALTERNATIVES

6.5.2.3 All 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.

ATTACHMENT II

SAFETY EVALUATION
RELATED TO
SAFETY REVIEW COMMITTEE
ORGANIZATION CHANGES

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

Section I - Description of the Proposed Changes

This safety evaluation will consider the effects of the reorganization of the Authority's Safety Review Committee as described below.

The Committee membership will be changed to include the next-to-highest level management in the Nuclear Generation, Engineering and Quality Assurance and Reliability Departments. The Directors of Mechanical, Electrical, Nuclear, Civil/Structural, and Piping and Process in the Design and Analysis Section of the Engineering Department will be replaced by the Vice President-Design and Analysis. The Managers of Radiological Health and Chemistry and Operational Analysis and Training in the Nuclear Generation Department will be replaced by the Vice President-Generic Nuclear Support. The Director of Environmental Programs in the Engineering Department will no longer be a member of the Committee.

The Resident Managers for the Indian Point 3 and James A. FitzPatrick facilities will be included as voting members of the Safety Review Committee, whereas previously, these individuals were non-voting members. Also, the Consultant to the Safety Review Committee will be included as a voting member of the Committee, whereas previously, this individual was an alternate voting member.

These changes in the Committee membership reduces the Committee to nine (9) voting members.

Section II - Purpose of the Proposed Changes

The Executive Vice President-Nuclear Generation has decided to focus more upper management attention and involvement in the safe operation of the Authority's nuclear facilities. These proposed changes to the Safety Review Committee membership serve to accomplish this objective.

The Safety Review Committee's responsibility for independent review and audit of the Authority's nuclear facilities to assure safe operation remains unchanged by the proposed membership changes.

The duties and responsibilities of the Chairman of the Safety Review Committee are not affected by this reorganization of the Committee. The Chairman shall continue to report directly to the Executive Vice President-Nuclear Generation.

The Safety Review Committee Program as described in the facility's FSAR and Technical Specifications is similar to that described in the NRC's Standard Technical Specifications (STS) (See Reference 3). The basic difference is the Authority's commitment that the Committee membership "shall collectively have the competence required to review problems in the following

areas".[Emphasis added] The STS allow the Committee "to provide independent review and audit of designated activities in the areas".[Emphasis added] The changes proposed are consistent with the intent of the STS. Moreover, the Committee members replaced from the Engineering and Nuclear Generation Departments will be the alternates to the new voting members from the same Departments.

The inclusion of the Resident Managers as voting members is consistent with the facilities' current Technical Specifications (and the STS) which state that "No more than a minority of the quorum shall have a direct line responsibility for the operation of the plant." The sentence in the facilities' FSAR that "The members of this committee do not have direct line responsibility for the operation of the plant" is merely a statement of fact of the present Committee membership, rather than a commitment.

The inclusion of the Consultant as a voting member is consistent with the current practice of the Chairman to consider that individual as one of the two alternates allowed "as voting members in SRC activities at any one time" under the current Technical Specifications (and the STS).

The Director of Environmental Programs will no longer be a member of the Committee; however, that individual shall be utilized as a consultant "as determined by the SRC Chairman to provide expert advice to the SRC" in matters relating to the environment as allowed under the current Technical Specifications (and the STS).

The Authority considers that the proposed changes can be classified as not likely to involve significant hazards considerations since this is "a purely administrative change to technical specifications." (Example (i), 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 proposed changes:

- (1) 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;

- (2) will not increase the probability of an accident or malfunction of any type different than those evaluated previously in the Safety Analysis Report;
- (3) will not reduce the margin of safety as defined in the basis for any Technical Specification;
- (4) does not constitute an unreviewed safety question pursuant to 10 CFR 50.59; and
- (5) does not constitute a significant hazards consideration pursuant to 10 CFR 50.92.

Section V - References

1. Indian Point 3 FSAR, Section 12.5.3 (Safety Review Committee)
2. Indian Point 3 Facility Operating License, Appendix A (Technical Specifications), Section 6.5.2 (Safety Review Committee)
3. NUREG-0452, Revision 3, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Section 6.5.2 Company Nuclear Review and Audit Group (CNRAG).