

ATTACHMENT I TO IPN-88-036

PROPOSED TECHNICAL SPECIFICATION CHANGES
TO REVISE MONTHLY OPERATING REPORT SECTION

New York Power Authority
Indian Point 3 Nuclear Power Plant
Docket No. 50-286

DPR-64

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STARTUP REPORT

6.9.1.1 A summary report of appropriate plant testing shall be submitted following (1), an amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performances of the plant. The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions or characteristics obtained during the testing and comparison of these values with acceptance criteria. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.2 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL RADIATION EXPOSURE REPORTS

6.9.1.3 A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposures according to work and job functions, 1/ e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

MONTHLY OPERATING REPORT

6.9.1.4 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator - Region 1, no later than the 15th of each month following the calendar month covered by the report.

1/ This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.9.1.5 A report of specific activity analysis results in which the primary coolant exceeded the limits of Specification 3.1.D. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Data providing the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator-Region 1 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 on excess of limits (Specification 3.9)
- b. Inoperable Seismic Monitoring Instrumentation (Specification 4.10)
- c. Seismic event analysis (Specification 4.10)
- d. Inoperable plant vent sampling, main steam line radiation monitoring or effluent monitoring capability (Table 3.5-4, items 5, 6 and 7)
- e. The complete results of the steam generator tube inservice inspection (Specification 4.9.C)
- f. Inoperable fire protection and detection equipment (Specification 3.14)
- g. Release of radioactive effluents in excess of limits (Appendix B Specifications 2.3, 2.4, 2.5, 2.6).
- h. Inoperable containment high-range radiation monitors (Table 3.5-5, Item 24)

SPECIAL REPORTS (con't)

- i. Radioactive environmental sampling results in excess of reporting levels (Appendix B Specification 2.7, 2.8, 2.9)
- j. Operation of Overpressure Protection System (Specification 3.1.A.8.c.)

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, inspection, repair and replacements 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.
- n. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and records showing that these procedures were followed.
- o. Records of service lives of all hydraulic snubbers listed in Table 3.13-1 including the date at which the service life commences and associated installation and maintenance records.

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 reasonable 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 IE 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 TO IPN-88-036

**SAFETY EVALUATION RELATED TO REVISION OF TECHNICAL
SPECIFICATIONS FOR MONTHLY OPERATING REPORTS**

**New York Power Authority
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
DPR-64**

**SAFETY EVALUATION OF
PROPOSED TECHNICAL SPECIFICATIONS
REGARDING MONTHLY REPORTS**

Section I - Description of Changes

The current Technical Specifications for Monthly Operating Reports conform to the requirements of Regulatory Guide 1.16, and require additional information to be provided on all corrective maintenance performed during an outage (Section 6.9.1.5.c.5). This additional report has proven to be burdensome to prepare, involving significant research and recordkeeping labor over and above that required to prepare the necessary information to satisfy Regulatory Guide 1.16. Furthermore, corrective maintenance information relative to the direct cause of a shutdown or outage is already provided in the monthly report entitled, "Unit Shutdown and Power Reductions."

The proposed changes to the Technical Specifications are contained in Attachment I. The wording of Section 6.9.1.4 has been changed to conform to that of the Standard Technical Specifications, and Section 6.9.1.5 has been deleted, thus eliminating the need for the additional corrective maintenance report to be submitted. Section 6.9.1.6 has also been deleted, since the safety and relief valve challenges will be incorporated into the Monthly Operating Report, instead of being reported on an annual basis.

Section II - Evaluation of Changes

The proposed changes will afford the Authority the opportunity to streamline the Monthly Operating Report to conform to that of the Standard Technical Specifications. Redundancy within the current Monthly Operating Report will be eliminated, and the reporting of safety and relief valve challenges will be provided on a more frequent basis by including this information within the monthly rather than the annual report. The Monthly Operating Report will continue to provide the information outlined in Regulatory Guide 1.16.

Section III - No Significant Hazards Evaluation

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to have no significant hazards, based on the following information:

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

Response

The proposed changes described and evaluated above do not involve a significant increase in the probability or consequences of an accident previously evaluated. Revising the wording of the section on Monthly Operating Reports does not alter any system or subsystem and will not change the conclusions of either the FSAR or SER accident analysis.

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

Response

These changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve any changes to the hardware, operability, surveillance, or record-keeping requirements of the facility. In addition, safety and relief valve challenges will subsequently be reported on a more frequent basis.

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

Response

The proposed changes do not involve a reduction in a margin of safety since they do not in any way affect the availability, operability, or surveillance requirements of any equipment within the facility. The changes revise the wording of the IP3 Technical Specifications section concerning monthly reporting requirements to conform to that of the Standard Technical Specifications.

The Authority considers that the proposed changes can be classified as not likely to involve significant hazards since they do not involve procedural or hardware changes to the plant's safety-related structures, systems, or components.

Section IV - Impact of the Changes

These changes will not adversely impact the following:

1. ALARA program
2. Security and Fire Protection Program
3. Emergency Plan
4. FSAR or SER Conclusions
5. Overall Plant Operations and the Environment

Section V - Conclusion

The incorporation of these changes: a) will not change 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 bases for any Technical Specification; d) does not constitute an unreviewed safety question; and e) involve no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1. Standard Technical Specifications for Westinghouse Pressurized Water Reactors (NUREG 0452, Revision 4)
2. Regulatory Guide 1.16, Revision 4, August 1975, "Reporting of Operating Information - Appendix A Technical Specifications"
3. IP3 FSAR
4. IP3 SER