

ATTACHMENT I TO IPN-88-049
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
REGARDING THE REMOVAL OF ORGANIZATION CHARTS

NEW YORK POWER AUTHORITY
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.

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a) Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
- b) The Resident Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c) The Executive Vice President - Nuclear Generation shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

- d) The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 PLANT STAFF

- a) Each 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.

g) Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. (Operating personnel are defined as on shift senior reactor operators, reactor operators, nuclear plant operators, shift technical advisors and shift contingency health physicists, I&C and maintenance personnel.) However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Resident Manager or his deputy, or higher levels of management, in accordance with established procedures.

h) At least one individual holding a Senior Reactor Operator (SRO) license shall be on duty in the Control Room at all times.

6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Radiation and Environmental Services Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the training coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976 with the exception of the training program schedule.

6.4.3 A training program for use of the post-accident sampling system shall be maintained to ensure that the plant has the capability to obtain and analyze reactor coolant and containment atmosphere samples under post-accident conditions.

6.4.4 A training program shall be maintained to ensure that the plant has the capability to collect and analyze or measure representative samples of radioactive iodines and particulates in plant gaseous effluent during and following an accident.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATING REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The Plant Operating Review Committee shall function to advise the Resident Manager on all matters related to nuclear safety and all matters which could adversely change the plants environmental impact.

ATTACHMENT II TO IPN-88-049
SAFETY EVALUATION OF
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
REGARDING THE REMOVAL OF ORGANIZATION CHARTS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
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SAFETY EVALUATION OF
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
REGARDING THE REMOVAL OF ORGANIZATION CHARTS

Section I - Description of Changes

This application for amendment to the Indian Point 3 Technical Specifications seeks to replace the organization charts contained in Section 6.2 of Appendix A with more general organizational requirements. These general requirements, in accordance with Generic Letter 88-06 (GL 88-06), incorporate with one deviation those organizational features currently depicted on the charts that are important for ensuring that the plant will be operated safely. The one deviation taken from the requirements of GL 88-06 is described in the following section. The proposed changes include:

- 1) Deletion of organization charts, figures 6.2-1 and 6.2-2.
- 2) Deletion of references made to those figures from technical specification sections 6.1, 6.2, 6.3, and the List of Figures.
- 3) Deletion of requirement that Operations Superintendent maintain a Senior Reactor Operator (SRO) license.
- 4) Addition of general requirements to sections 6.2.1 and 6.2.2.
- 5) Addition to Table of Contents.

Additionally, proposed changes not related to the subject generic letter include:

- 1) Deletion of figure titles 2.1-2, 3.10-5, and 4.2-2 from the List of Figures.
- 2) Addition of figure title 3.8-1 to the List of Figures.

These changes are editorial in nature. Figures 2.1-2 and 3.10-5 were deleted from the Technical Specifications by Amendment No. 48 to the Facility Operating License; Figure 4.2-2 was deleted by Amendment No. 57, and Figure 3.8-1 was added by Amendment No. 70. The changes to the List of Figures were inadvertently overlooked.

Section II - Evaluation of Changes

The content required in the Administrative Controls Section of the Technical Specifications is specified in 10 CFR 50.36.c(5). The regulation requires that the Technical

Specifications contain the provisions necessary to assure operation of the facility in a safe manner, but does not specifically require inclusion of organization charts in the Technical Specifications.

While organization charts delineate management hierarchy, the specific details of organizational structure are not essential to the safe operation of the facility. Those key organizational features currently depicted on the charts which are important to safety shall be verbally incorporated in sections 6.2.1 and 6.2.2 of the Technical Specifications.

In accordance with Generic Letter 88-06, the key organizational features to be incorporated as general requirements include:

- 1) The documentation and update of organizational information describing lines of authority, responsibility, and communication in a document other than the plant Technical Specifications.
- 2) The designation of the corporate executive official responsible for overall plant nuclear safety and authority.
- 3) The designation of the onsite management official responsible for overall unit operation and control.
- 4) The designation of those onsite positions requiring a senior reactor operator (SRO) or reactor operator (RO) license, and
- 5) The provision of sufficient organizational freedom to provide independence from operational pressures for onsite quality assurance, training, and health physics personnel.

The first requirement shall be satisfied through the annual update of the IP-3 Final Safety Analysis Report (FSAR). Subchapter 12.1 of the IP-3 FSAR contains the required organizational information. The second and third requirements shall be satisfied by the incorporation of specific statements in section 6.2 of the Technical Specifications. Incorporation of the fourth and fifth requirements are described below.

Inclusion of the fourth requirement has been modified from that specified by the Generic Letter. The Authority is proposing the more general statement that "(a) at least one

individual holding a Senior Operator Reactor (SRO) License shall be on duty in the Control Room at all times," rather than designating the individual position(s).

As currently depicted in Technical Specification figure 6.2-2, the Operations Superintendent is required to maintain an SRO license. However, the Authority, which is committed to ANSI N18.1 (1971), "Selection and Training of Nuclear Power Plant Personnel," interprets Article 4.2.2 as allowing the Operations Superintendent relief from maintaining a Senior Operator License. Article 4.2.2. of ANSI N18.1 (1971) clearly states, in part, "(a)t the time of initial core loading or appointment to the active position the operations manager shall hold a Senior Operator's License." The current Technical Specification requirement unnecessarily exceeds that of ANSI N18.1 (1971).

The Authority believes the Operations Superintendent's knowledge of plant operations should remain current but that this can be done through effective training and daily interactions. Maintaining the SRO license requires a considerable amount of time and detracts from the Operations Superintendent's normal functions. The Authority estimates that 39.5 days, or approximately 15.2% of the Operations Superintendent's workyear, are spent in classroom and simulator requalification and preparation for the testing required to maintain an SRO license. This time would be better spent by the Operations Superintendent in the performance of his intended duties as described in the FSAR. These responsibilities require a technically sound background, knowledge of nuclear plant operations, and a significant amount of time to administratively manage the department's functions. Functions requiring in-depth, plant-specific knowledge are performed by capable and licensed individuals reporting to the Operations Superintendent. The Shift Supervisor who reports to the Operations Superintendent and maintains an SRO license, is responsible for operation of the plant in accordance with requirements of the Operating License, Technical Specifications, and approved procedures.

Thus, the Authority proposes the lessening of the current technical specification requirement for the Operations Superintendent to that specified by Article 4.2.2 of ANSI N18.1 (1971). This change does not adversely affect the safe operation of the plant.

Incorporation of the fifth general requirement outlined above is proposed as paragraph 6.2.1.d of the Technical Specifications. The provisions assuring independence from

operational pressures are contained in the FSAR. Training personnel report to an onsite manager, the Training Superintendent. The Training Superintendent reports directly to the Resident Manager. This chain of command is separate from the plant's operations management hierarchy, thus, ensuring independence from operational pressures.

Health physics personnel report to an onsite manager, the Radiological and Environmental Services (RES) Superintendent. The RES Superintendent is responsible to the Superintendent of Power but has recourse to the Resident Manager or the Executive Vice President - Nuclear Generation (EVP-NG) if necessary. As described in subchapter 12.1 of the FSAR, the RES Superintendent may recommend cessation of work or plant shutdown should radiological conditions threaten a radiation hazard to plant personnel or the general public. This provision ensures compliance with the proposed technical specification paragraph 6.2.1.d.

Personnel performing quality assurance functions report to an onsite manager, the Quality Assurance Superintendent. While the Quality Assurance Superintendent may communicate with onsite management, he reports directly to the Director - Quality Assurance in the headquarters office. This chain of command is distinct from that of plant management and, thus, affords compliance with the proposed technical specification paragraph 6.2.1.d.

The proposed changes incorporating the requirements of GL 88-06 will not affect the safe operation of the plant, and will reduce the needless expenditure of resources for both the Authority and the Commission.

Section III - No Significant Hazards Evaluation

In accordance with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based upon 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 amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because deletion of the

organization charts from the Technical Specifications does not affect plant operation. As in the past, the NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the licensee's organizational structure, responsibilities and authorities, and personnel qualification requirements be included in the Final Safety Analysis Report (FSAR). As required by 10 CFR 50.71 (e), the Authority submits annual updates to the FSAR. Chapter 12 of the IP-3 FSAR provides a description of the organization, and organization charts to the same level of detail as currently exists in the Technical Specifications have been included via the 1988 IP-3 FSAR Update.

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

Response

The proposed amendment does not create the possibility of a new or different kind of accident from that previously evaluated because the proposed changes do not involve any physical alterations of plant configuration or changes to setpoints or operating parameters.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response

The proposed amendment does not involve a significant reduction in a margin of safety. Through the Authority's Quality Assurance program and its commitment to maintain only qualified personnel in positions of responsibility, it is assured that safety functions performed by the onsite and the corporate organizations will continue to be performed at a high level of competence.

Based on the above reasoning, the Power Authority considers that the proposed changes can be classified as not likely to involve significant hazards.

Section IV - Impact of Changes

These changes will not adversely impact the following:

1. ALARA Program
2. Security and Fire Protection Programs
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 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 bases for any Technical Specification; d) does not constitute an unreviewed safety questions; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1. IP-3 FSAR
2. IP-3 SER
3. 10 CFR
4. IP-3 QA Manual
5. Generic Letter 88-06, dated March 22, 1988
6. ANSI N18.1 (1971)
7. Amendment No. 48 to Facility Operating License No. DPR-64, dated February 2, 1984.
8. Amendment No. 57 to Facility Operating License No. DPR-64, dated June 24, 1985.
9. Amendment No. 70 to Facility Operating License No. DPR-64, dated December 22, 1986.