



**John C. Brons**  
Executive Vice President  
Nuclear Generation

July 24, 1989  
IPN-89-045

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

**Subject:** Indian Point 3 Nuclear Power Plant  
Docket No. 50-286  
Proposed Changes to Technical Specifications  
Regarding Plant Staff Requirements for Senior  
Reactor Operator (SRO) and Reactor Operator (RO)  
Licenses

- References:**
- (1) Letter from NYPA (J. C. Brons) to NRC, IPN-88-049, dated November 10, 1988, entitled "Proposed Changes to Technical Specifications Regarding the Removal of Organization Charts."
  - (2) Generic Letter 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements," dated March 22, 1988.

Dear Sir:

In response to several telephone conversations with the Commission, this letter supplements Reference (1).

Reference (1) transmitted proposed technical specifications aimed at replacing the organization charts contained in Section 6.2 of Appendix A of the Operating License with the more general requirements delineated by Reference (2), Generic Letter 88-06. Included in Reference (1) was a deviation from General Requirement Item number 4 of the generic letter, and a proposal to suspend the current Indian Point 3 (IP3) Technical Specification requirement that the Operations Superintendent maintain a senior reactor operator (SRO) license.

The proposed change enclosed in this letter supersedes the previously proposed deviation. Proposed Specification 6.2.2i) directly addresses the generic letter requirement to identify those onsite positions requiring SRO and reactor operator (RO) licenses. This requirement was delineated in the generic letter as one of the key organizational features to be incorporated in the Technical Specifications as a replacement for the organization charts. In addition, the proposed change withdraws

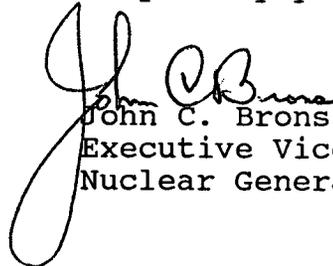
the previously proposed suspension of the requirement for the Operations Superintendent to maintain an SRO license.

The proposed change contained in the Attachment to this letter completes compliance with the requirements set forth by the generic letter, and does not adversely affect the safe operation of the plant. The conclusions of the previously submitted Safety Evaluation remain valid, and the Authority hereby requests removal of the organization charts from the IP3 Technical Specifications in accordance with the requirements of the generic letter.

In accordance with 10 CFR 50.91, a copy of this application and the associated attachment is being submitted to the designated New York State Official.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,



John C. Brons  
Executive Vice President  
Nuclear Generation

STATE OF NEW YORK  
COUNTY OF WESTCHESTER

Subscribed and sworn to before me  
this 24 day of July 1989

Barbara Ann Taggart  
Notary Public

**BARBARA ANN TAGGART**  
NOTARY PUBLIC, State of New York  
No. 4851437  
Qualified in Putnam County 90  
Commission Expires Jan. 27, 1990

Attachment

cc: U.S. Nuclear Regulatory Commission  
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King of Prussia, PA 19406

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Indian Point Unit 3  
U.S. Nuclear Regulatory Commission  
P.O. Box 337  
Buchanan, NY 10511

cc: continued

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