



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

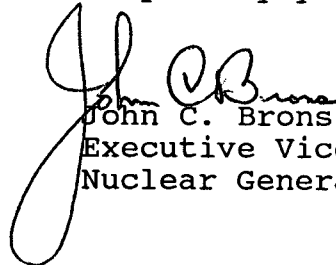
the previously proposed suspension of the requirement for the Operations Superintendent to maintain an SRO license.

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


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
475 Allendale Avenue
King of Prussia, PA 19406

Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

cc: continued

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